

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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Remote Videotaped Oral Deposition of

HILLIARD DREW GALLOWAY

MOVE Texas Civic Fund

30(b)(6)

Thursday, April 23, 2020

Reported by:
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TX CSR 10925 - CA CSR 11414

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2 (All Appearances Via Remote Videoconference)

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1	I N D E X		
2	DEPOSITION OF HILLIARD DREW GALLOWAY		
3	EXAMINATION	PAGE	
4	BY MS. MACKIN	6	
5	BY MS. MARZIANI	144	
6	ERRATA AND SIGNATURE	147	
7	REPORTER'S CERTIFICATION	149	
8	-----oo-----		
9	DEFENDANTS'	PAGE	
10	Exhibit 1	Defendants' Notice of Oral	9
11		Deposition Pursuant to Federal Rule	
12		of Civil Procedure 30	
13	Exhibit 2	Multi-page document, Bates No.	13
14		MOVE-000001 through MOVE-000370	
15	Exhibit 3	Declaration of Hilliard Drew	140
16		Galloway	
17	-----oo-----		
18			
19			
20			
21			
22			
23			
24			
25			

1 BE IT REMEMBERED that on Thursday,
2 April 23, 2020, commencing at the hour of 10:04 a.m.,
3 via remote videoconferencing, before me,
4 KIMBERLEE SCHROEDER, a Certified Shorthand Reporter in
5 and for the State of Texas and the State of California,
6 duly authorized to administer oaths pursuant to
7 Section 30(c) of the Federal Rules of Civil Procedure
8 and the Texas Rules of Civil Procedure, personally
9 appeared

10 HILLIARD DREW GALLOWAY,
11 called as a witness herein by the Defendants, who,
12 having been duly sworn, was thereupon examined as
13 hereinafter set forth.

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1 P R O C E E D I N G S

2 Thursday, April 23, 2020 10:04 a.m.

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4 THE REPORTER: This is the deposition of
5 MOVE Texas Civic Fund in the matter of Jarod Stringer,
6 et al. v. Ruth R. Hughes, et al. We are appearing
7 remotely via Zoom due to the coronavirus pandemic. We
8 are on the record at 10:04 a.m.

9 My name is Kim Schroeder, and my business
10 address is with Integrity Legal Support Solutions,
11 P.O. Box 245 Manchaca, Texas 78652.

12 Would all persons present please introduce
13 themselves for the record?

14 MS. MACKIN: This is Anna Mackin with the
15 Texas Attorney General's office on behalf of the
16 defendants.

17 MS. MARZIANI: This is Mimi Marziani from the
18 Texas Civil Rights Project on behalf of the plaintiffs.

19 THE WITNESS: My name is Hilliard Drew
20 Galloway on behalf of MOVE Texas Civic Fund.

21 MS. BRAILEY: My name is Emily Brailey here
22 with Perkins Coie on behalf of the intervenors.

23 MS. STEVENS: This is Beth Stevens. I am with
24 the Texas Civil Rights Project here on behalf of
25 plaintiffs.

1 MR. COX: Ryan Cox, C-o-x, also with the Texas
2 Civil Rights Project.

3 MR. MIRZA: Hani Mirza with the Texas Civil
4 Rights Project on behalf of plaintiffs.

5 MR. GONZALEZ: Joaquin Gonzalez with Texas
6 Civil Rights Project on behalf of plaintiffs.

7 MS. MACKIN: And I would like to note on the
8 record that the parties have agreed that we will be
9 taking the oath remotely.

10 HILLIARD DREW GALLOWAY,
11 after being first duly sworn by the Certified Shorthand
12 Reporter, was examined and testified as follows:

13 EXAMINATION

14 BY MS. MACKIN:

15 Q. Good morning, Mr. Galloway. If I could have
16 you please speak and spell your name for the record.

17 A. Good morning. My name is Hilliard Drew
18 Galloway. That's H-i-l-l-i-a-r-d, D-r-e-w,
19 G-a-l-l-o-w-a-y.

20 Q. Good morning, Mr. Galloway. My name is Anna
21 Mackin. I am an attorney with the Texas Attorney
22 General's Office, and I represent the defendants in the
23 lawsuit in which you are giving this deposition.

24 Have you been deposed before?

25 A. No.

1 Q. So I'm going to go over a couple of ground
2 rules just to keep things in order, and it's especially
3 important that we all be diligent about it because we
4 are doing this through a video conference.

5 Please try to remember to give a verbal answer
6 to my questions. So "yes," "no," rather than nodding
7 your head or shaking your head because that doesn't come
8 across on the record. And please try to avoid saying
9 "uh-huh," "huh-uh," things like that we say in normal
10 conversation because Ms. Schroeder is writing down
11 everything, and it might not be clear in the record what
12 "uh-huh" or "huh-uh" means. Okay?

13 A. Yes, I understand.

14 Q. Thank you. And please try to let me finish my
15 questions before you begin your answer. I will endeavor
16 to allow you to finish your answer before I ask my next
17 question. Again, this will help us get a clear record
18 and help us not needlessly complicate the Court
19 Reporter's job in writing down everything we're saying.
20 Okay?

21 A. Yes, I understand.

22 Q. If you don't understand one of my questions,
23 will you please tell me so I can rephrase it?

24 A. I will.

25 Q. Okay. And that oath you just took, you know

1 you're sworn to tell the truth as if you were testifying
2 in front of a judge or a jury. You understand?

3 A. Yes, I understand.

4 Q. Okay. So this is not an endurance contest.

5 You are the talent here. If you ever need to take a
6 break, use the rest room, stretch your legs, just let me
7 know. I'll have you answer any question that's pending,
8 but as soon as we wrap that up, we'll go ahead and take
9 that break. Okay?

10 A. Yes. Thank you.

11 Q. And is there any reason you might not be able
12 to answer my questions honestly, completely and
13 accurately today?

14 A. Not to my knowledge.

15 Q. Okay. Thank you. During today's deposition,
16 I'm going to be showing you some documents by putting
17 them on the screen. I also understand that your
18 attorneys have made available to you some documents that
19 ya'll produced in anticipation of this deposition; is
20 that right?

21 A. Yes. That's correct.

22 Q. Okay. So if I'm publishing a document on the
23 screen, if you have any trouble seeing the document,
24 just let me know. If you need me to zoom in or out,
25 scroll up or down, I'm happy to do that. Just let me

1 know. Okay?

2 A. Yes, I understand.

3 Q. And so just to practice, I'm going to show you
4 Exhibit 1. Bear with me just a minute. I want to make
5 sure it comes up.

6 (Exhibit No. 1 was marked for identification.)

7 MS. MACKIN: Q. All right. I am showing you
8 a document that will marked Exhibit 1.

9 Can you see the document on your screen?

10 A. I can, yes.

11 Q. Do you recognize this document?

12 A. Yes, I do.

13 Q. Okay. And so, again, as we move through the
14 day, if I show you a document, I'm going to assume you
15 can see it clearly unless you tell me otherwise. Okay?

16 A. Yes. That's correct.

17 Q. Okay. So do you understand that you are here
18 today pursuant to this notice that I am showing you on
19 the screen, the Notice of Oral Deposition of MOVE Texas?

20 A. Yes. That's correct.

21 Q. And I'm scrolling down to page 5 of the
22 document which lists 30(b)(6) representative deposition
23 topics. So do you understand that through this
24 document, MOVE has been instructed to designate one or
25 more persons to testify on its behalf, and that it has

1 designated you to testify on each topic listed in this
2 notice?

3 A. Yes, I understand.

4 Q. Okay. And that the testimony that you give is
5 on behalf of MOVE Texas Civic Fund and will bind MOVE
6 Texas Civic Fund in this lawsuit?

7 A. Yes, I understand.

8 Q. Okay. And so just to be clear, today when I
9 say "MOVE" or "MOVE Texas," I'm referring to MOVE Texas
10 Civic Fund unless I specify otherwise. Okay?

11 A. Thank you for that clarification.

12 Q. And can we agree when you say "MOVE" or "MOVE
13 Texas," I'll understand you to be referring to MOVE
14 Texas Civic Fund unless you tell me otherwise?

15 A. Yes, I understand.

16 Q. Okay. So I'm going to just go through these
17 seven topics in this notice.

18 With respect to MOVE Texas, topic No. 1 is
19 your mission. Are you designated to testify on this
20 topic?

21 A. Yes.

22 Q. And then topic No. 2, which says, "Your
23 organization, including your organizational structure,
24 employees, physical assets, parent and sibling entities,
25 tax status and history, the services you provide, and

1 the activities you perform," are you designated to
2 testify on this topic?

3 A. Yes.

4 Q. Thank you for that.

5 And topic 3, "Your funding amounts,
6 operational expenses, and operational budget between
7 January 1st, 2018, and the present," are you designated
8 to testify on this topic?

9 A. Yes.

10 Q. Okay. And pardon the tedium. I just need to
11 get all of this on the record.

12 Topic No. 4, "All activities on which you have
13 spent funds or to which you have dedicated resources in
14 Texas between January 1st, 2018, and the present," and
15 then it lists various activities. Are you designated to
16 testify on this topic?

17 A. Yes.

18 Q. Thank you.

19 And topic 5, "All activities on which you plan
20 to spend funds or to which you plan to dedicate
21 resources in Texas between the present and January 1st,
22 2024," are you designated to testify on this topic?

23 A. Yes.

24 Q. All right. Thank you.

25 And topic 6, "The allegations in your

1 **complaint and the factual basis therefore."**

2 A. Yes.

3 Q. **You're designated to testify on that topic.**

4 **And when I say "your complaint," you understand that to**
5 **mean the complaint filed in this lawsuit on your behalf**
6 **by your attorneys?**

7 A. Yes, that I understand.

8 Q. Okay. And then finally, topic 7, the
9 **documents produced in response to the subpoena duces**
10 **tecum, which I believe you have available to you, are**
11 **you designated to testify on this topic?**

12 A. Yes.

13 Q. Okay. Great. Thank you for that. I'm going
14 **to close out Exhibit 1 for now.**

15 **Mr. Galloway, how did you prepare for today's**
16 **deposition?**

17 A. I received the Notice of Deposition. I spoke
18 with my attorneys. I spoke with the Alliance For Youth
19 Organizing and their attorney. I instructed our
20 organization to pull the required documents and produce
21 those to our attorneys. And then I reviewed the final
22 deposition documents.

23 Q. **When you say "the final deposition documents"**
24 **that you reviewed, what are you referring to?**

25 A. I am referring to the abated or time

1 stamped or stamped --

2 **Q. Bates stamped?**

3 A. Bates stamped, I'm sorry. The Bates stamped
4 documents.

5 Q. Okay. And just so we are super clear on the
6 record, I believe that is the documents marked MOVE 1
7 through MOVE 370.

8 A. Yes. That's correct.

9 Q. Okay. Those have been provided to me by your
10 attorneys. We will make those Exhibit 2 to this
11 deposition, and we will come back to those and discuss
12 those in a little while.

13 (Exhibit No. 2 was marked for identification.)

14 MS. MACKIN: Q. Other than those documents
15 that are Bates numbered that we just discussed, did you
16 review any other documents to prepare for today's
17 deposition?

18 A. Only the complaint and the deposition notice.

19 Q. Did you meet with anyone at MOVE Texas to
20 prepare for today's deposition?

21 A. No, I did not. I just instructed our staff to
22 pull the documents as required.

23 Q. Okay. And did you meet with your counsel to
24 prepare for today's deposition?

25 A. Yes.

1 Q. And you mentioned also speaking with counsel
2 for the Alliance For Youth Organizing.

3 A. Yes.

4 Q. What is the Alliance For Youth Organizing?

5 A. The Alliance For Youth Organizing is MOVE
6 Texas Civic Fund's 501(c)(3) fiscal sponsorship
7 organization.

8 Q. What is a fiscal sponsorship organization?

9 A. We, essentially, as -- as MOVE Texas Civic
10 Fund is a, I think in lay terms would be considered like
11 a subsidiary or doing-business-as organization of the
12 Alliance For Youth Organizing, and so therefore, we have
13 a Fiscal Sponsorship Agreement that lays out how we --
14 how we collaborate together.

15 Q. Okay. We'll go into some details about that
16 later. But just to kind of wrap up our laying the
17 ground work here, are you adequately familiarized with
18 the facts to testify about MOVE's records and the topics
19 in the notice?

20 A. Yes.

21 Q. Okay. Thank you for that.

22 I want to talk a little bit about your
23 background. You are the executive director of MOVE
24 Texas Civic Fund; is that right?

25 A. Yes.

1 **Q. And how long have you held that position?**

2 A. I joined the organization in April 2016.

3 **Q. During your entire time with MOVE Texas Civic**
4 **Fund, you've held the title of executive director?**

5 A. Yes.

6 **Q. Okay. What are your duties in that role?**

7 A. My general duties are to oversee the
8 direction, mission, strategy of the organization, to
9 work with our board of directors and partners to execute
10 that mission and to ensure that our program -- programs
11 and fundraising are aligned with that mission.

12 **Q. Have there been any changes in your job duties**
13 **during your tenure as executive director?**

14 A. For the most part, no. My job is to oversee
15 the mission of the organization.

16 **Q. And how much decision-making authority would**
17 **you say you have as executive director?**

18 A. As executive director of the organization, I
19 do have, you know, I do have broad decision-making power
20 with the idea that I answer to the board of the
21 directors. And I, through our Fiscal Sponsorship
22 Agreement with the Alliance For Youth Organizing, I
23 collaborate with them.

24 **Q. So what types of decisions would you be able**
25 **to make independently versus what types of decisions**

1 **would you have to take to your Board of Directors to get**
2 **approval?**

3 A. Our Board of Directors approves our budget
4 size and approves our general work plan, which is a work
5 plan that I, myself, work together with our staff to
6 write every year. We also, you know -- we additionally,
7 like I can hire for the organization and everything, but
8 the board can -- the board hires for the executive
9 director role.

10 Q. Okay. So other than the Board of Directors,
11 **do you report to anyone in your capacity as executive**
12 **director of MOVE Texas Civic Fund?**

13 A. No.

14 Q. And I would presume some folks do report to
15 **you, however; right?**

16 A. That is correct.

17 Q. **How many people report to you?**

18 A. Currently, I have -- I have seven direct
19 reports currently.

20 Q. Okay. We'll jump into the organizational
21 structure a little bit more later. Right now, I want to
22 get a sense of your experience, your work experience
23 before you joined MOVE Texas Civic Fund.

24 **Before you became executive director of MOVE**
25 **Texas, what was your job?**

1 A. My job before I was hired at MOVE Texas was I
2 was the program coordinator for the New Politics Forum
3 at the Annette Strauss Institute for Civic Life at the
4 University of Texas at Austin.

5 **Q. Just briefly, what were your job duties in**
6 **that role?**

7 A. I managed a program called the New Politics
8 Forum, which was a nonpartisan program that helped
9 millennials and young people get involved in civics
10 across the state.

11 **Q. When you say "civics," can you tell me a**
12 **little bit more about what you mean?**

13 A. Civics I use as like a broad term. But that
14 means, you know, like the actual part of volunteerism,
15 philanthropy, and electoral participation.

16 **Q. And how long did you hold that position at the**
17 **Annette Strauss Institute?**

18 A. I believe I was at the Institute for roughly a
19 year before coming here.

20 **Q. How did you obtain that position?**

21 A. I was hired for that position.

22 **Q. Sure. Who hired you?**

23 A. At that time, I was hired by the person
24 overseeing that entire department. I was hired by the
25 person overseeing the New Politics Forum program.

1 **Q. Do you recall their name?**

2 A. Emily Beshear is her name.

3 **Q. And why did you leave your position at the**
4 **Annette Strauss Institute?**

5 A. To join MOVE Texas.

6 **Q. Before Annette Strauss, what was your job?**

7 A. I was an intern in the White House Office of
8 Social Innovation and Civic Participation.

9 **Q. Oh, cool. That must have been awesome.**

10 **How long were you in the White House?**

11 A. I was there for the fall semester of 2014 and
12 a little bit of early 2015.

13 **Q. And what were your job duties?**

14 A. I served at the pleasure of the Special
15 Assistant to the President. His name was Jonathan
16 Greenblatt.

17 **Q. And that was under President Obama?**

18 A. That's correct.

19 **Q. And what sort of responsibilities did you have**
20 **on a day-to-day basis in that role?**

21 A. I created Mr. Greenblatt's daily schedule book
22 and wrote speeches for him and pulled information he
23 needed as requested.

24 **Q. And was that -- you mentioned it was an**
25 **internship. I know they're highly selective in the**

1 **White House, so it's not like just an internship. But**
2 **how is that -- was that funded? Was it through a**
3 **fellowship or anything, or were you just unpaid and**
4 **living off of your own support in DC?**

5 A. I was there as a University of Texas System
6 Archer, Bill Archer Fellow.

7 Q. **Very cool. One of my sorority sisters did**
8 **that. I was going to ask why you left, but I presume**
9 **it's because the fellowship ended.**

10 A. That's correct.

11 Q. **So before your work in the White House, where**
12 **did you work?**

13 A. I was a full-time student at the University of
14 Texas at San Antonio College of Public Policy. During
15 that time, I also interned at the City of San Antonio
16 with then Councilman Ron Nirenberg and additionally with
17 Bexar County Commissioners Court under then Precinct 4,
18 County Commissioner Tommy Atkinson.

19 Q. **And how about before that?**

20 A. Before that, I was a store manager for Specs
21 Family Partners, which is the wine store --

22 Q. **I'm familiar, yeah.**

23 **So how long did you work in the wine industry?**

24 A. Total, I worked in the wine industry for
25 almost ten years.

1 Q. So that seems like something of a hard pivot
2 from sommelier to civic activist/organizer.

3 **What prompted you to make that change?**

4 A. When I landed in San Antonio, came here to
5 live for Specs Family Partners, I fell in love with
6 local organizing, and essentially just, like, I knew
7 this is, like, what I wanted to do. And so I decided to
8 go back to school at the University of Texas at
9 San Antonio for public administration because I wanted
10 to work in government. I wanted to work in nonprofits.

11 Q. **And are you happy with your decision?**

12 A. I am very happy.

13 Q. Good. Good. You said you fell in love with
14 kind of community organizing. Is there like a
15 foundational experience or sort of a something that
16 really made you realize "this is what I want to do"? Or
17 was it just kind of an overall realization?

18 **That was a terrible question.**

19 MS. MARZIANI: Objection. Vague. But yes.

20 MS. MACKIN: Yes. Let me try it again.

21 Q. **Like, if you're at a dinner party and somebody
22 asked you why you got involved, do you have an anecdote
23 that you would offer?**

24 A. Yes. When I found out that there was no law
25 protecting LGBTQ individuals and families from landlords

1 forcing them to leave their lease because of their
2 sexual identification, I began to work in the community
3 in San Antonio on the nondiscrimination ordinance in
4 2013. And that was a foundational experience for me.

5 Q. Okay. Well, let's pivot then a little bit
6 back to MOVE Texas Civic. Sounds like you have quite a
7 bit of fascinating experience in both wine and local
8 organizing that I would love to talk about, but I know
9 we have to get out of here today.

10 So when was MOVE Texas Fund first established?

11 A. So MOVE Texas Civic Fund was formally known as
12 MOVE San Antonio Foundation. And MOVE San Antonio
13 Foundation became a fiscal sponsor program of the
14 then-called Bus Federation in 2014.

15 Q. You say the "then-called Bus Federation."

16 What is that called now?

17 A. That's called the Alliance For Youth
18 Organizing.

19 Q. And who established MOVE San Antonio?

20 A. Just to be clear, MOVE San Antonio is a
21 501(c)(4) organization that has now been named MOVE
22 Texas Action Fund.

23 Q. Okay.

24 A. But that was established by seven students at
25 the University of Texas at San Antonio.

1 Q. Were you one of those students?

2 A. No, I was not.

3 Q. To the best of your knowledge, why was -- I
4 want to be very clear what we're talking about because I
5 know sometimes as organizations evolve, there's a
6 501(c)(3) and a 501(c)(4), and they're renamed. I'm not
7 trying to clutter things. I just want to make sure
8 we're clear.

9 So first, there was MOVE San Antonio, which is
10 now MOVE Texas Action Fund?

11 A. That's correct.

12 Q. Okay. And then came MOVE Texas Civic Fund.
13 And when was that established?

14 A. The -- so first came MOVE San Antonio
15 Foundation, which again, as part of us becoming a fiscal
16 sponsor with the Bus Federation in 2014, was founded at
17 that point. And then at -- then essentially, the name
18 for both entities was changed in the last couple of
19 years. MOVE San Antonio Foundation became MOVE Texas
20 Civic Fund, and the Bus Federation became the Alliance
21 For Youth Organizing.

22 Q. And the Bus Federation, which is now the
23 Alliance For Youth Organizing, do you know how they were
24 first connected with those seven students who started
25 MOVE San Antonio?

1 A. Anecdotally, because I wasn't there, the seven
2 students or a few of them were connected to the
3 leadership of the Bus Federation which is or was and
4 still is a federated model of youth organizations across
5 the United States, and they help -- they help these
6 groups like grow and raise money and learn from each
7 other and that kind of thing. And they were connected
8 through the leadership of the Bus Federation.

9 **Q. Do you know any individuals in the leadership**
10 **of the Bus Federation by name who were involved in**
11 **making that connection?**

12 A. The executive director at that time was Matt
13 Singer.

14 **Q. Do you know why the decision was made to**
15 **establish a 501(c)(3) in addition to the existing**
16 **501(c)(4)?**

17 MS. MARZIANI: Objection. Vague.

18 Can you clarify whose decision-making you're
19 talking about?

20 MS. MACKIN: Sure.

21 **Q. The decision on behalf of the folks at MOVE**
22 **San Antonio Foundation, which eventually decided to**
23 **create the 501(c)(3) that is called MOVE Texas Civic**
24 **Fund. I don't know if that was any better.**

25 MS. MARZIANI: Objection. Mischaracterizes

1 prior testimony.

2 MS. MACKIN: Q. I just want to make sure I'm
3 clear. The MOVE San Antonio Foundation started in 2013;
4 right?

5 A. MOVE San Antonio was started in 2013 and 2014
6 as a 501(c)(4) organization in the State of Texas.

7 Q. Okay.

8 A. And that group then decided to have a
9 501(c)(3) fiscally sponsored organization as part of the
10 Bus Federation which then became MOVE San Antonio
11 Foundation.

12 Q. Okay. And I'm not trying to be confusing. I
13 think I'm just confused. I understood your testimony to
14 be that MOVE San Antonio Foundation was the first
15 organization that was established, and it was
16 established as a 501(c)(4).

17 Is that correct, or is that not right?

18 A. No, that's not correct.

19 MOVE San Antonio Foundation is now -- is the
20 old name -- the old -- is now named MOVE Texas Civic
21 Fund.

22 Q. Okay.

23 A. Which is the 501(c)(3) fiscally sponsored
24 organization.

25 Q. Okay. So the first organization from which

1 the genesis of the Civic Fund and the Action Fund was a
2 501(c)(3)?

3 A. The genesis organization was MOVE San Antonio,
4 which is a 501(c)(4) organization.

5 Q. Thank you. I'm sorry I missed that.

6 So you have the genesis organization, which is
7 MOVE San Antonio, which is a (c)(4)?

8 A. That's correct.

9 Q. And then after that, the decision was made to
10 establish a 501(c)(3) called the MOVE San Antonio
11 Foundation; right?

12 A. That's correct.

13 Q. Okay. And when was that decision made?

14 A. That decision was when we joined the Bus
15 Federation. And so MOVE San Antonio Foundation is the
16 fiscally sponsored unaffiliated association of the Bus
17 Federation.

18 Q. And how was the (c)(4) MOVE San Antonio funded
19 when it was first established?

20 MS. MARZIANI: Objection. This is outside the
21 scope of the notice. He's here on behalf of the Civic
22 Fund.

23 MS. MACKIN: Q. You can answer unless your
24 attorney tells you not to.

25 A. It was -- MOVE San Antonio was funded by

1 donors.

2 Q. Then when was the decision made to rename the
3 MOVE San Antonio Foundation MOVE Texas Civic Fund?

4 A. That decision was sometime in 2018. I want to
5 say late 2018, but the decision was made because we grew
6 outside of San Antonio.

7 Q. Was that decision made at the same time that
8 the decision was made to rename MOVE San Antonio MOVE
9 Texas Action Fund?

10 A. Yes.

11 Q. Okay. Thank you for that.

12 I just want to make sure I'm clear on
13 something. Where is MOVE Texas Civic Fund incorporated?

14 A. MOVE Texas Civic Fund, as it is today, is a
15 fiscally sponsored organization of the Alliance For
16 Youth Organizing, which is a 501(c)(3) organization that
17 is incorporated in Oregon.

18 Q. So MOVE Texas Civic Fund doesn't have its own
19 charter of incorporation; instead, it is a subsidiary
20 for the Alliance For Youth Organizing. Is that right?

21 A. When you use "subsidiary," we use the word
22 "fiscal sponsor," yes.

23 Q. But otherwise, that is right?

24 A. I'm not sure about the legal word
25 "subsidiary," but yes.

1 Q. Okay. And what is MOVE Texas Civic Fund's
2 mission?

3 A. MOVE Texas Civic Fund is a grassroots,
4 nonpartisan, nonprofit organization that builds power
5 for young people through civic education, leadership
6 development, and issue advocacy.

7 Q. You sound like you may have said that a few
8 times before. Just rolls off the tongue.

9 So I want to talk through -- well, actually,
10 who developed that mission statement?

11 A. The mission statement was developed by the
12 founding students and has evolved over the years to
13 shorten or become more clear, but that statement has
14 been largely created by the founding students.

15 Q. Has the mission of MOVE Texas Civic Fund
16 changed over time?

17 A. Our core mission is to help young people get
18 involved in civics, their local government, state
19 government. That mission has not changed. Some of the
20 strategies and how to do that have changed over time.

21 Q. Okay. I want to talk about MOVE Texas Civic
22 Fund's organizational structure. I think it might be
23 easier to do this with a document. I'm going to pull up
24 the page Bates labeled MOVE 361.

25 All right. I have placed on the screen the

1 page of Exhibit 2 labeled MOVE 361.

2 Can you see that document, Mr. Galloway?

3 A. I can.

4 Q. Do you recognize that document?

5 A. I do.

6 Q. What is it?

7 A. This is the MOVE Texas Civic Fund
8 organizational chart.

9 Q. And so I see over to the -- in the top left
10 corner, there is a bubble that says "MOVE Texas Civic
11 Fund."

12 A. That's correct.

13 Q. And there's the bubble that says "MOVE Texas
14 Action Fund."

15 A. That's correct.

16 Q. So do MOVE Texas Civic Fund and MOVE Texas
17 Action Fund share employees?

18 A. All of the employees listed here are -- are
19 paid by MOVE Texas Action Fund, but MOVE Texas Civic
20 Fund directs portions of their work.

21 Q. Okay. Does MOVE Texas Civic Fund have any
22 employees that are not reflected on this page?

23 A. No.

24 Q. Okay. Are any of the employees reflected on
25 this page only providing services to MOVE Texas Action

1 Fund, or are they all providing services to both the
2 Civic Fund and the Action Fund?

3 A. They provide service to both entities.

4 Q. Okay. All of the employees do?

5 A. To my knowledge, yes.

6 Q. Okay. Thank you for that.

7 So I want to talk through the individuals
8 listed on this chart. Take all the time you need to
9 review it. I'm not trying to rush you. But just to
10 save a little time, I'm trying to get a sense of whether
11 this is still an accurate reflection of all of the
12 employees employed by MOVE Texas Civic Fund and what
13 their roles are.

14 A. That is correct. We have made job offers for
15 the field director and the two advocacy organizers that
16 say "TBD," but they have not started their first day
17 with us yet.

18 Q. We had someone start their first day the day
19 we all got sent home and told not to come back. So I
20 can understand that, whether or not that was the reason
21 that the start has been delayed.

22 A. We just made the job offers recently.

23 Q. Is MOVE Texas Action Fund's mission different
24 from MOVE Texas Civic Fund's mission?

25 A. The core mission is the same, to build power

1 through civic education and leadership development and
2 youth advocacy.

3 **Q. Are the salaries of the individuals listed on**
4 **MOVE 361, are they all paid from the same funding**
5 **source?**

6 MS. MARZIANI: Objection. Vague.

7 MS. MACKIN: Q. You can answer if you
8 understand.

9 A. All of the employees listed here are paid for
10 -- paid from MOVE Texas Action Fund, and we, through a
11 -- through our accounting processes, reimburse the
12 (c)(4) from the (c)(3) per our Fiscal Sponsorship
13 Agreement.

14 Q. Okay. So all of these employees are paid both
15 by -- all of these employees are paid by the (c)(4), but
16 part of the money the (c)(4) pays these employees comes
17 from the fiscal sponsorship of the Alliance For Youth
18 Organizing. Do I have that right?

19 A. That's not correct.

20 Q. Okay. How am I wrong?

21 A. All of these employees are paid for, like
22 their time sheet is paid for from MOVE Texas Action
23 Fund. And then we take their time sheet, which is
24 broken down by job description and by (c)(3) and (c)(4)
25 activities, and we reimburse -- we create an invoice

1 from MOVE Texas Action Fund that is then sent to MOVE
2 Texas Civic Fund.

3 MOVE Texas Civic Fund audits that invoice for
4 accuracy to ensure that all of those activities are
5 501(c)(3) compliant. And upon that audit, then approves
6 that invoice, which then pays that invoice amount back
7 to MOVE Texas Action Fund.

8 **Q. Got it. Do all of these employees have to
9 maintain records of their time and separate it out into
10 the activities that they worked on?**

11 A. Every employee maintains a time sheet for the
12 pay period. And that time sheet has information on how
13 many hours they worked total, how many hours they worked
14 on certain projects, how many hours they worked on
15 (c)(4) activities, and how many hours they worked on
16 501(c)(3) activities.

17 **Q. Okay. And do the employees themselves make
18 the determination of whether their activity is a (c)(3)
19 activity or a (c)(4) activity?**

20 A. We have guidelines for that, and then their
21 supervisors verify that information.

22 **Q. And then it's audited as well?**

23 A. That's correct.

24 **Q. Okay. Thank you for that.**

25 **I'm going to pull down this screen share. I**

1 don't think we need it anymore.

2 So I want to talk now about MOVE Texas Civic
3 Fund's activities. And I want to get a full list of
4 sort of the buckets of activity that MOVE Texas Civic
5 Fund pursues. So I'm going to start with my
6 understanding of what those buckets are based on looking
7 at the documents that ya'll provided. But please,
8 correct me if I'm wrong; fill in any gaps. I'm just
9 trying to get an understanding.

10 As I'm reading the documents, it looks like
11 MOVE Texas Civic Fund pursues issue advocacy?

12 A. MOVE Texas Civic Fund only pursues 501(c)(3)
13 issue advocacy, which is more of an education based --

14 Q. I understand. You're not advocating for
15 political candidates. I used to work at a 501(c)(3), so
16 I totally get it. Not trying to suggest issue advocacy
17 that is not permissible for a 501(c)(3).

18 A. That's correct.

19 Q. And civic education as well?

20 A. That's a large bucket of other smaller
21 projects, but yes.

22 Q. And would it be fair to say that leadership
23 development is a bucket?

24 A. Leadership development is another large bucket
25 within that program or within that organization, yes.

1 **Q. And Get-Out-the-Vote efforts?**

2 A. There are very specific Get-Out-the-Vote
3 efforts that are done by MOVE Texas Civic Fund, MOVE
4 Texas Civic Fund, including Parties at the Polls, which
5 is a program that is done on college campuses, that kind
6 of thing.

7 **Q. Would it be fair to say that Get-Out-the-Vote
8 is a bucket, or would that kind of be nested under
9 another broad category of activities?**

10 A. I would say that that would be nested
11 underneath civic education.

12 **Q. Okay. What about voter registration efforts?**

13 A. That's a program underneath civic education,
14 but it is one of the more dominant programs.

15 **Q. Okay. So I generally have a sense of three
16 buckets: issue advocacy, civic education and leadership
17 development. Does that kind of capture MOVE Texas Civic
18 Fund's activities, or did I miss a bucket of activities?**

19 A. Yes. Those are the three, the three
20 activities that we list in our mission statement.

21 **Q. So I want to go through kind of each of the
22 buckets. I understand that there are some projects that
23 maybe are smaller or maybe kind of fit in both buckets
24 or may be kind of weird, like not easy to fit in a
25 bucket. So I'm not trying to pin you down on every**

1 single thing that has been done, but just to kind of get
2 a broader understanding of your primary activities.

3 So I want to start with talking through issue
4 advocacy. How would you describe MOVE Texas Civic
5 Fund's issue advocacy activity?

6 A. Issue advocacy is the smallest of the three
7 buckets for MOVE Texas Civic Fund, and predominantly --
8 it predominantly includes voting rights advocacy or
9 voting rights, like --

10 Q. And what types of activities specifically with
11 respect to this voting rights issue advocacy does
12 MOVE Texas Civic Fund participate in?

13 A. That would include educating voters about, you
14 know, like things like online voter registration would
15 also include polling locations on college campuses.
16 There is a, like, active campaign called Democracy From
17 the Ground Up within that bucket.

18 Q. And this might not be an easy question to
19 answer. So if the answer is complicated, let me know,
20 and I can try to ask it better.

21 Who develops the issue advocacy plan for MOVE
22 Texas Civic Fund?

23 A. That's developed by myself and staff members.

24 Q. Anyone in particular who you work with a lot
25 on developing that?

1 A. Raven Douglas is our political director and
2 oversees much of that work.

3 **Q. Who implements MOVE Texas Civic Fund's issue**
4 **advocacy activities?**

5 A. That would be done by the -- in conjunction
6 with the political director and the advocacy manager and
7 his or her team.

8 **Q. So it would be staff?**

9 A. Staff, fellows, interns, volunteers. Those
10 are the majority of the folks.

11 **Q. As the executive director, do you approve all**
12 **issue advocacy activities that MOVE Texas Civic Fund**
13 **pursues?**

14 A. Can you define "approve"?

15 **Q. Sure. Well, let me ask it differently.**

16 **You have the final sign-off on the issue**
17 **advocacy plan; right?**

18 A. I help the staff develop the plan, which is
19 typically an annual plan, and then take that plan to the
20 board for approval. And then in instances where there
21 are potentially rapid response requirements, I approve
22 those.

23 **Q. Okay. If it's easier to answer this question**
24 **by referring to a document, we can do that. Just let me**
25 **know and we'll find the right document. But do you know**

1 **approximately how much MOVE Texas Civic Fund spent on**
2 **issue advocacy activities in 2018?**

3 A. Best way to pull that up would be to look at
4 the 2018 budget that we produced.

5 Q. Okay. Do you happen to know offhand what
6 **Bates number that is at?**

7 A. It's in the latter part. I want to say in the
8 range of 350. Per your request, I do have the
9 deposition production open, so I'm going to just look at
10 that.

11 Q. I'm looking through it as well, so hopefully
12 we can find it.

13 MS. MARZIANI: I believe it's 363. Everybody
14 should double check me.

15 MS. MACKIN: Q. Does that look right,
16 Mr. Galloway?

17 A. I'm pulling it up on my screen right now.
18 Sorry.

19 Q. **Sure. No problem.**

20 A. This is our general accounting budget, that is
21 correct.

22 Q. **So does it reflect how much MOVE Texas Civic**
23 **Fund spent on issue advocacy activities in 2018?**

24 A. Issue advocacy would have been built into
25 several of these accounting buckets, and to that time

1 would have been listed into "Wages and Salaries," which
2 is Category 5000, and then "Fellowship and Educational
3 Stipends," which is bucket No. 6300.

4 Q. So if I am trying to piece together the
5 approximate amount that MOVE Texas Civic Fund spent on
6 issue advocacy activities in 2018, how would I do that
7 based on this document? Part of the reason I became a
8 lawyer is because I was told there would be no math.

9 A. There is the way that we -- like from this
10 accounting document is that those two buckets house the
11 -- their time stamps, or like when they report they do
12 MOVE Texas Civic Fund issue advocacy, it is built into
13 those two buckets.

14 Q. If I just added up the Category 5000 and
15 Category 6300, would all of those funds be dedicated to
16 issue advocacy, or would some other activities be
17 reflected in that total?

18 A. That would also include other activities.

19 Q. Would it include activities from all three
20 buckets of the Civic Fund's activities?

21 A. Yes, most likely.

22 Q. If we added up -- for 2018, for example, if we
23 added up Category 5000 plus Category 6300, would it be
24 fair to say that that reflects -- let me ask it a
25 different way.

1 So if I were to ask you how much did MOVE
2 Texas Civic Fund spend on issue advocacy in 2018, could
3 you give me a precise figure?

4 A. Not based on this document.

5 Q. Is there another document that might allow you
6 to do that?

7 A. I'm unsure.

8 Q. How about let's pivot to MOVE Texas Civic
9 Fund's civic education activities. How would you
10 describe those activities?

11 A. Civic education includes voter registration
12 and voter education.

13 Q. Okay.

14 A. And also be very specific, voter mobilization
15 that I mentioned earlier.

16 Q. Get-Out-the-Vote.

17 A. (Nods head.)

18 Q. And if I could just get a verbal yes, I'm
19 sorry.

20 A. I'm sorry, yes.

21 Q. No problem. I know you were not being
22 evasive. It's old habits.

23 So we talked a little bit earlier about how in
24 consultation with specific staff you helped develop MOVE
25 Texas Civic Fund's issue advocacy initiatives.

1 Would it be fair to say you also helped
2 develop MOVE Texas Civic Fund's civic education
3 initiatives in consultation with staff?

4 A. That's correct.

5 Q. And will those also need to go to the board
6 for approval unless it's a rapid response issue?

7 A. Our -- yes. Yes.

8 Q. Would you be able to tell me how much MOVE
9 Texas Civic Fund spent on civic education activities in
10 the year 2018?

11 A. Again, according to this budget, that would
12 have been built into those two categories.

13 Q. The category --

14 A. 5000, "Wages and Salaries," and 6300,
15 "Fellowship and Educational Stipends."

16 Q. Okay.

17 A. And there is obviously some other areas like
18 "Office Supplies," 7210.

19 Q. Where it's overhead but kind of applies to a
20 lot of categories?

21 A. Printing, pens, clipboards.

22 Q. Is the same true for 2019?

23 A. 2019, there is a document Bates stamped --
24 sorry, I can barely see it -- 368, which lists expenses
25 for categories under Youth Organizing Civic Education.

1 Q. Okay. On MOVE 368, the line item "Youth
2 Organizing," what does that reflect?

3 A. That reflects some of the expenses for civic
4 education and overhead, which is also, again, wages and
5 salaries. Fellowship stipends or fellowship pay would
6 also be included into that area as well.

7 Q. Does it reflect all expenses for civic
8 education in 2019?

9 A. To the best of my knowledge.

10 Q. Is that figure broken down by specific types
11 of civic education anywhere?

12 A. Not to my knowledge.

13 Q. Okay. How about if we wanted to talk about
14 MOVE Texas Civic Fund's civic education activities for
15 2020? Is there a document that reflects how much has
16 been spent?

17 A. There is a budget that we produced, which was
18 MOVE-000362. And again, very similar to the document
19 that you just saw, that was youth organizing and
20 overhead for MOVE Texas Civic Fund.

21 Q. And that youth organizing bucket includes all
22 the civic education activities budgeted for 2020?

23 A. That's correct.

24 Q. Is that broken down by the type of civic
25 education activity anywhere?

1 A. Not to my knowledge.

2 Q. All right. Let's talk about MOVE Texas Civic
3 Fund's leadership development activities.

4 Tell me about those. What types of activities
5 does MOVE Texas Civic Fund pursue towards leadership
6 development?

7 A. We have three programs that fall under
8 leadership development. Our fellowship program, which
9 is a paid student opportunity that students learn
10 hands-on activities, including voter registration. And
11 they also get training on a variety of subjects and
12 access to speakers.

13 The internship program, which is an unpaid
14 opportunity for students, high school students, but
15 often does a lot of the same similar, like, civic
16 activities and has access to the same educational
17 resources.

18 And then our volunteer program, which is also
19 an unpaid, you know, opportunity for anybody in the
20 community to come help with our civic education work and
21 that kind of stuff. And we help build skills within
22 that volunteer base.

23 Q. Who develops -- it sounds like you have three
24 different buckets in that leadership bucket. Is that
25 fair to say?

1 A. That's fair to say.

2 Q. Who develops those leadership development
3 opportunities? Is it specific to which of the three
4 categories it falls into?

5 A. The majority of the program is overseen by our
6 leadership development manager who reports to, at this
7 time, our political director -- ultimately will report
8 to me in the future -- but she develops a lot of the
9 curriculum, and you know, helps us identify potential
10 fellows, interview, hire them, that kind of thing.

11 Q. And this is a little bit my personal curiosity
12 because I did a similar fellowship program where we were
13 placed at partner organizations like nonprofits around
14 the community for four days a week, and one day a week
15 we came in for classes and speakers and things like
16 that. You mentioned the fellowship program. Did you
17 say that's a paid opportunity for students?

18 A. We occasionally have a few people that aren't
19 students or maybe going to vocational school. But the
20 majority of fellows are either undergraduate or graduate
21 students.

22 Q. Did they work directly for MOVE Texas Civic
23 Fund, or are they placed kind of at other places in the
24 community?

25 A. They, again, are paid by MOVE Texas Action

1 Fund.

2 Q. **Oh, okay.**

3 A. And MOVE Texas Civic Fund directs them, their
4 work.

5 Q. Okay. Do they work for the Civic Fund or the
6 Action Fund, or do they work for --

7 A. Can you repeat that question?

8 Q. **Sure.**

9 **The fellows, when they come to report to work,**
10 **do they -- is it a MOVE Texas entity, or is it an**
11 **outside entity?**

12 A. It's a MOVE Texas entity.

13 Q. Okay. It's the Action Fund, if I'm
14 understanding?

15 A. The Action Fund is the entity that actually
16 pays them.

17 Q. **Okay.**

18 A. But again, they could be doing MOVE Texas
19 Civic Fund duties or MOVE Texas Action Fund duties.

20 Q. **And do they track that --**

21 A. That's correct.

22 Q. **-- what the employees do? Okay.**

23 A. They're paid employees.

24 Q. **Does MOVE Texas track the success of its issue**
25 **advocacy efforts?**

1 A. Yes.

2 Q. **How?**

3 A. We have -- just to clarify, we're talking
4 about MOVE Texas Civic Fund's --

5 Q. **Yes.**

6 A. -- Youth Advocacy programs?

7 Q. **Yes.**

8 A. We have clear items that we are working on
9 within that, like, very small bucket of this work. And
10 we measure success by either helping more young people
11 get involved, and that could be showing up to an
12 educational seminar or attending some sort of like town
13 hall, or that could be, you know, getting young people
14 involved in research on things like online voter
15 registration or vote by mail, that kind of stuff. And
16 then also just like the general, like, increasing access
17 to democracy work that's being done.

18 Q. **Can MOVE Texas Civic Fund apportion the cost
19 of influencing each person on an issue?**

20 A. Can you define "influencing," and can you
21 define "person"?

22 Q. **Sure.**

23 **So when you look at the data that ya'll
24 maintain, the information ya'll have, and say, "Okay, we
25 spent X amount of dollars" -- I'm just making it up --**

1 let's say we spent a hundred dollars on this program,
2 and we know that we reached a hundred people, so it cost
3 \$1 per person to engage in this issue advocacy program.

4 A. Sure. From a broader perspective, when it
5 comes to, like, data collection and reporting, not just
6 on the issue advocacy work but just in general, there
7 are programs that we can monitor like the actual, like,
8 cost per activity.

9 And then there are certain activities that
10 either occur unexpectedly or that are either -- that
11 occur out of, like, an existing plan. Like, it's a
12 deviation of the existing plan that can't be measured or
13 that we just don't have the ability to measure at the
14 cost-per-person or cost-per-activity level.

15 Q. How does MOVE Texas Civic Fund decide what
16 civic education efforts to pursue?

17 A. Civic education is defined, again, as voter
18 registration, which is the largest of those programs
19 within civic education, voter education, and then again
20 a very, very small amount of voter mobilization. And
21 voter registration has always been at the core of our
22 mission because we see that as the first step for young
23 people getting involved in democracy.

24 And so we make decisions on how to register
25 voters, like when to register voters, and how many

1 voters to register every year based on our
2 organizational capacity and what we think are, like, our
3 campus growth roles, stuff like that.

4 **Q. You have limited resources, as all**
5 **organizations do, so you try to allocate them to where**
6 **they're going to have the most impact?**

7 A. That's correct. We have, you know, like, we
8 can't be everywhere. And so, therefore, we have to
9 determine, like, where we will be at and how we will
10 accomplish that.

11 Q. **What inputs do you look at to make those**
12 **decisions?**

13 A. We look at geography. So are we already in
14 the city. Are we, you know, is it a new expansion
15 effort. We look at the, you know, our relationships
16 with the campus administrators. Most of our work
17 happens on college campuses, university campuses,
18 community colleges, vocational schools and high schools.

19 We analyze our relationships and determine
20 whether new relationships have to be built or existing
21 relationships can be leveraged. And then we look at our
22 ability to fund that work for the long-term.

23 Q. **Anything else?**

24 A. I'm sure there's other, like, micro concerns,
25 like, depending on the city or specific campus, but

1 those are typically major -- I would say the major
2 buckets I would think of when we're considering work.

3 **Q. Do you adjust your activities based on success**
4 **rate?**

5 A. We adjust our -- we adjust our programs based
6 on success rate. We adjust our strategies based on
7 success rate. And then we adjust our relationships
8 based on like how or at least our relationship
9 strategies.

10 Does that make sense?

11 Q. **I adjust my relationships from time to time,**
12 **too.**

13 **When it comes to making those adjustments**
14 **doing that fine-tuning, evolving your programs, is that**
15 **something, a decision that -- are those decisions you**
16 **kind of make in consultation with your staff, and then,**
17 **if necessary, you take it to the board for approval?**

18 A. That's correct. So I, often the field
19 organizers and fellows and interns have a much better
20 grasp of what is happening and what's successful on
21 their campus or in the field. And so I listen to that.

22 I work with either the other directors or
23 other managers to implement changes to those strategies
24 or expand relationships as-needed. And then if there's
25 additional, you know, items that need either approval by

1 the board or recommendations or consultation, we will
2 take it, too.

3 Q. I just want to touch on something that I think
4 I glossed over earlier.

5 In terms of MOVE Texas Civic Fund's leadership
6 development activities, if I wanted to identify how much
7 MOVE Texas Civic Fund spent on those leadership
8 development activities for 2018, is there a document
9 that would show me that information?

10 A. The best document to show you, like, what we
11 spent in 2018 would be the 2018 budget, which was --
12 which was MOVE Exhibit 363.

13 Q. Then in terms of 2019, that would be on MOVE
14 368?

15 A. That is -- let's see. The best to see what we
16 actually spent was the 2019 budget, which is 364.

17 Q. It looks to me like on 364, there is no
18 specific category for leadership development. There is
19 just that, the two line items that we were putting
20 together wages and salaries and -- okay.

21 So for leadership activities in 2019,
22 leadership development activities in 2019, I'm looking
23 at the 2019 budget at 364. Where would I see that
24 expenditure for leadership development activities?

25 A. Leadership development activities are built

1 into category 5000, "Wages and Salaries." And then
2 other expenses are built into like things like 8110,
3 "Travel and Staff Meals." And additionally, 8140,
4 "Facilities Rental and Catering," and 9200, "Printing,
5 Copying, Publications." Those are portions of that
6 program.

7 **Q. But there's no way to give me an exact figure**
8 **for how much MOVE Texas Civic Fund spent on leadership**
9 **development in 2019; is there?**

10 A. That is the way that we do our accounting in
11 that budget there.

12 Q. So is that a yes?

13 A. Can you repeat the question?

14 Q. Sure.

15 **Is there a way to identify a precise dollar**
16 **amount that MOVE Texas Civic Fund spent on leadership**
17 **development activities in 2019?**

18 A. Our leadership development program is built
19 into this budget.

20 Q. And so the budget doesn't reflect the precise
21 amount that was spent on leadership development
22 activities?

23 A. Leadership development activities are part of
24 these categories, which are recommended for us to track
25 via our CPA and bookkeeper.

1 Q. Sure, sure. I'm sorry, I'm not trying to
2 suggest like funny accounting. That's not what I'm
3 getting at. I'm just trying to figure out if the way
4 that -- to figure out if the records would enable ya'll
5 to give a precise dollar amount that was spent on these
6 leadership development activities in 2019. I'm not
7 suggesting you're legally required to have that. I'm
8 just trying to figure out if it exists.

9 A. This is the only thing that exists to my
10 knowledge.

11 Q. Then for leadership development 2020, what
12 would be the best reflection of how much MOVE Texas
13 Civic Fund spent on leadership development activities in
14 2020? Would that be the 2020 budget?

15 A. That's correct. Because 2020 is still under,
16 it's in progress.

17 Q. Right. When I say "spent," I mean both has
18 spent and intends to spend.

19 A. That's correct. Yes.

20 Q. Then within this bucket of issue advocacy,
21 which I want to just make sure I'm clear on the record
22 because these were topics in the notice and it's
23 completely fine if you're unable to parse it out to the
24 level of detail that I am asking whether or not you
25 have. I just want to make sure that I have the closest

1 thing that's available to ya'll.

2 So for issue advocacy in 2018, the best
3 reflection of what MOVE Texas Action Fund spent would be
4 the 2018 budget at MOVE 363; is that correct?

5 A. That is correct.

6 Q. Issue advocacy expenses are a part of item
7 5000, "Wages and Salaries," and item 6300, "Fellowships
8 and Educational Stipends"; is that right?

9 A. That is correct.

10 Q. And those two buckets, 5000 and 6300, would
11 they also include expenditures in 2018 for civic
12 education?

13 MS. MARZIANI: Objection. I want to make sure
14 the record is clear, Anna. We are talking only about
15 MOVE Texas Civic Fund. You said "Action Fund" by
16 accident.

17 MS. MACKIN: Oh, thank you for that.

18 Q. Yes, I meant Civic Fund in terms of the funds
19 that MOVE Texas Civic Fund has spent on civic education
20 activities in the year 2018, the best reflection of that
21 would be at MOVE 363, the 2018 budget?

22 A. That is correct.

23 Q. And it is part of "Wages and Salaries" and
24 "Fellowships/Educational Stipends"?

25 A. Can you repeat which category that was again?

1 Q. Sure. I'm getting a little confused, too.

2 **Sorry. Civic education in 2018.**

3 A. Civic education includes voter registration,
4 voter education, and a very small amount of very
5 specific voter mobilization. So, therefore, it would be
6 those activities, payments for those activities would be
7 included in places like category 5000, "Wages and
8 Salaries," Category 6300, "Fellowship and Educational
9 Stipends," Category 7210 -- sorry -- 7210, "Office
10 Supplies," and Category 8110, "Travel and Staff Meals,"
11 and 8140, "Facility Rental and Catering," and 9200,
12 "Printing, Copying and Publication."

13 Q. Okay. But within all of those categories you
14 just listed, are any of those broken out based on how
15 much was spent on civic education activities in
16 particular?

17 A. The way that we monitor our spending and
18 budgeting is through this accounting method.

19 Q. So I'm just asking if MOVE Texas Civic Fund
20 has any way to determine with certainty how much of each
21 of those categories you mentioned was dedicated to civic
22 education as opposed to issue advocacy or leadership
23 development?

24 A. To my knowledge, there is no, like, auto run
25 report that could be done that way, if that makes sense.

1 There's no report that has already been made that can
2 track that. I would imagine that if we, like, audit all
3 of 2018, that there was a way to break all of that
4 apart, but that is not currently available.

5 **Q. In order to kind of break it apart to parcel**
6 **it out by issue advocacy, civic education, and**
7 **leadership development, what information would you need**
8 **to look at?**

9 A. I would need to consult our CPA and our
10 accountant and then determine, like, actual records of
11 work or projects and to see if those are available or
12 how those would be created, if they could be created.

13 **Q. And would your answer be the same for 2019?**

14 A. Yes.

15 **Q. And for 2020 so far?**

16 A. 2020 so far, if you look at the budget, there
17 are those buckets that are -- that you identified, which
18 is civic education/youth organizing, leadership
19 development, and issue advocacy. Understanding that
20 overhead is also part of those, those programs.

21 **Q. All right. I would like to refer you to the**
22 **document production which your attorneys made available**
23 **to you. And I would like to go through these documents,**
24 **hopefully not in an excruciating level of detail. But**
25 **just so that I have an understanding of what each one is**

1 and what it shows.

2 So if I could direct your attention to the
3 document marked MOVE 1. I'm going to omit the leading
4 0s so we don't burn time saying "00000."

5 This appears to me to be a single document on
6 just one page; is that right?

7 A. That's correct.

8 Q. **And what is this document?**

9 A. This appears to be a block-walking script that
10 would be used by field organizers, fellows, interns or
11 volunteers on how to -- guiding them on a conversation
12 to have with people when they knock on their doors.

13 Q. **This document would fall within which of the
14 three buckets of the Civic Fund's activities?**

15 A. This would be either -- this would be in
16 either the issue advocacy bucket and/or voter education
17 bucket.

18 Q. **And how would you know the difference?**

19 A. It would be determined on like, essentially,
20 like the supervisor would determine that as they built
21 out the project.

22 Q. **So like a script like this could be used for
23 issue advocacy, or it could be used for civic education?
24 You would have to tweak it based on the specific issue
25 or whether you're doing voter registration, but it could**

1 **go either way; is that fair?**

2 A. Yeah.

3 **Q. Okay.**

4 A. This seems to be, like, they are educating
5 people on our Democracy From the Ground Up campaign and
6 then asking them to volunteer.

7 **Q. I notice that this script -- strike that.**

8 **All right. I would like to turn your**
9 **attention to the next document in the stack. It appears**
10 **to me that MOVE 2 through MOVE 23 are a single**
11 **PowerPoint presentation. Take some time to review it**
12 **and let me know if my understanding is correct.**

13 A. Thank you. (Reviewing document.)

14 **That appears to be correct, yes.**

15 **Q. Thank you. What is this PowerPoint used for?**

16 A. This is a PowerPoint that is -- that
17 essentially talks about our civic leadership -- civic
18 leadership program, which is what we call leadership
19 development. And it is an overview of training on
20 advocacy and how, you know, fellows, interns, volunteers
21 can be active in that.

22 **Q. Who developed this PowerPoint?**

23 A. This was made in spring 2020, so I believe
24 this was made by our leadership development manager in
25 conjunction with probably other folks within the

1 organization.

2 Q. And the leadership development manager is,
3 what's their name?

4 A. Cecilia Montesdeoca.

5 Q. Monte -- I'm sorry?

6 A. Montesdeoca.

7 Q. The date on this is spring 2020.

8 Were there prior versions of this advocacy
9 training that were used in the past?

10 A. Potentially. I'm unsure if this is a
11 brand-new PowerPoint or if this was built out from like
12 -- if it was built from scratch or added onto.

13 Q. Okay. Who receives this training?

14 A. A variety of people: our fellows, members of
15 the fellowship; the internship, members of the
16 internship; and then also this could be utilized for
17 volunteers.

18 Q. Okay. And who presents it?

19 A. This would often be presented by a variety of
20 people: our leadership development manager, since this
21 deals with some of our democracy like expansion
22 campaigns or access campaigns; that would be also Raven
23 Douglas, our political director; and/or Alex Birnal, our
24 advocacy manager.

25 Q. Which of the three main buckets would you say

1 this falls into?

2 A. This is an issue advocacy presentation.

3 Q. While we're here, I want to jump back quickly

4 to Document 1. Does Document 1 -- I know you mentioned

5 it could be used for either issue advocacy or civic

6 education, specifically it could be used in like a voter

7 registration effort. But -- I'm sorry, go ahead.

8 A. I did not say that it would be utilized in a

9 voter registration effort.

10 Q. Oh, okay. Okay.

11 A. I did say voter education.

12 Q. Education, got it. Thank you. All right.

13 Let's move down to MOVE 3. What is the source

14 of this map on MOVE 3, if you know?

15 A. I'm unsure.

16 Q. As kind of the landing page, the first page of
17 this presentation, tell me how this sets the tone. Tell
18 me how this relates to MOVE's mission.

19 A. This is what we call a grounding slide, and it
20 helps set the tone that there has been, you know, that
21 there's been community organizing work happening before
22 us and that there will be community organizing work
23 happening after us and our work is important.

24 Q. Moving on to slide 4 -- I promise I'm not
25 going to be this granular on all 370 pages -- tell me

1 **about this slide.**

2 A. This is what we call a "Community Agreements"
3 slide. When we bring people together, we want to, like,
4 sort of set the, like, have an agreement set so that
5 everybody understands that, like, what's expected of
6 them, you know, and their behavior, and the way they
7 conduct themselves. And so this is part of that.

8 **Q. I just have to ask for my own edification, can**
9 **you tell me a little -- what is "One Diva, One Mic"?**

10 A. That instructs our class to not to talk over
11 each other. So if one person is talking, listen. So
12 one person talking at a time.

13 **Q. You are the diva of the moment.**

14 **I understand what "Land the Plane" means.**

15 **"Jargon Giraffe," what is that?**

16 A. That is our most famous community agreement.
17 That is when somebody uses typically an abbreviation or
18 an acronym that some folks don't understand, like if you
19 say fiscal sponsor and I don't know what that means,
20 then I will throw up my Jargon Giraffe and the speaker
21 understands to clarify that term.

22 **Q. Maybe we should start using that in**
23 **depositions or something.**

24 MS. MARZIANI: That would be hard for lawyers.

25 MS. MACKIN: Yes, it would. We all have

1 jargon. That could be a powerful tool.

2 Q. **Then what is "Bicycle Rack" down at the**
3 **bottom?**

4 A. Often ideas come up within discussions that
5 aren't completely relevant to that discussion at the
6 moment. And so often when we present, we have like a
7 piece of paper on the wall that's called a Bicycle Rack.
8 And so if we're talking about a nonprofit structure and
9 I bring up something that's not relevant, we will add it
10 to that Bicycle Rack so that it can be clarified later
11 or discussed later.

12 Q. **I've actually heard of that concept, but I**
13 **heard it referred to as the Idea Parking Lot, and the**
14 **Bicycle Rack is much more earth friendly.**

15 I want to jump down to MOVE 6. The second
16 bullet under "Objectives of CLP Trainings" is
17 "Internalize Values." What does that mean in this
18 context?

19 A. MOVE has a couple of core values. We believe
20 that young people are powerful. We also believe that
21 that we need to create spaces, like diverse spaces that
22 are welcoming and open and for a wide variety of ideas.

23 We also believe that regardless of the
24 position that the person is in, they have a voice, and
25 they have power. And so because of that, you know, I

1 can learn from an intern just as much I can learn from a
2 director at MOVE.

3 So it's values like that that we're trying to
4 teach fellows, teach interns, teach volunteers. And
5 that is core to our mission.

6 **Q. Down under "Training #3," the first bullet,**
7 **"Learn how the advocacy team drives policy change."**
8 **Tell me about that. Tell me about mission's advocacy**
9 **work to -- pardon me -- MOVE's advocacy work to drive**
10 **policy change?**

11 A. I want to clarify. This is MOVE Texas Civic
12 Fund?

13 Q. Yes. I know I said that at the beginning of
14 the deposition. I know we've been talking a lot about
15 it. The continued clarifications are totally welcome.
16 I will still understand it to mean the Civic Fund unless
17 I specify otherwise.

18 A. Yes. MOVE Texas Civic Fund, you know, again,
19 our advocacy team is there to help young people research
20 the issues that matter to them and then figure out how
21 they themselves can take action, whether that is not
22 inside our organization or whether that is an active
23 campaign our organization is working on. For instance,
24 Democracy From the Ground Up.

25 Q. **Scrolling down, just a quick passing on No. 7,**

1 **what happens at a Youth Power Happy Hour? And can I go?**

2 A. I think you should attend.

3 Youth Power Happy Hours are where we invite
4 young people, especially folks that we've either
5 registered to vote or that have signed pledge to vote
6 cards for us or on the campuses we work with.

7 And sometimes these Youth Power Happy Hours
8 are just for young people to get together and build
9 community. And sometimes if it's near elections, then
10 we invite all political candidates, regardless of party,
11 to those spaces to interact with young people and talk
12 about the issues that they care about.

13 Q. Let's go down to MOVE 9. The slide says,
14 "Issue advocacy at MOVE Texas," meaning MOVE Texas Civic
15 Fund. And it mentions "Current Campaigns."

16 A. Yes, it does say that.

17 Q. Is this -- it lists "Democracy Done Right."
18 Is Democracy Done Right its own campaign, or are those
19 three bullets nested under it sort of separate
20 campaigns?

21 A. Democracy Done Right is our sort of, like,
22 larger brand of democracy, like democracy education and
23 democracy advocacy. Each one of these underneath those,
24 whether you want to call them campaigns or projects, are
25 relevant to that larger bucket of how we want to get

1 more young people involved in our democracy.

2 **Q. So is Democracy Done Right sort of an**
3 **existing, like you said -- I forget the exact words you**
4 **used -- mantra, and then the three "Democracy From the**
5 **Ground Up," "Redistricting," "Census," have those always**
6 **been sort of the elements of Democracy Done Right, or do**
7 **those focus areas change over time?**

8 A. Just to clarify your question --

9 **Q. Please do.**

10 A. -- I think what you're asking is: Does
11 Democracy Done Right evolve or shift? You know, so
12 Democracy Done Right is a campaign that we work on year
13 after year after year. And then the, let's say, for
14 instance, if we want to call them projects or sub
15 campaigns of Democracy From the Ground Up, and
16 Redistricting and Census are specific things that, you
17 know, are maybe time-based, maybe place-based.

18 **Q. And so this first one, Democracy From the**
19 **Ground Up, it says, "Set of 11 reforms focused at the**
20 **county level to improve voting rights and election**
21 **infrastructure."**

22 **How does this project further the mission of**
23 **MOVE Texas Civic Fund?**

24 A. This project under MOVE Texas Civic Fund
25 educates young people about how improvements to our

1 elections infrastructure, that could be online voter
2 registration, automatic voter registration, polling
3 locations on college campuses, et cetera, can help
4 increase access and the ability for young people to
5 participate in democracy, cast their vote in elections.

6 **Q. Then this next project area, "Redistricting,"**
7 **how does this project further the mission of MOVE Texas**
8 **Civic Fund?**

9 A. You know, like we have some campuses that we
10 work on that are in completely two -- maybe the campus
11 line runs down or the district line runs down the middle
12 of the campus, and that causes confusion for young
13 people. Maybe even the county line runs down through
14 the middle.

15 So those are things that we are talking about
16 or educating young people about how they can be involved
17 in that process and how they can show up to those field
18 hearings to learn more.

19 **Q. And it says down here, "Look at the impact of**
20 **new electoral maps on college campuses."**

21 **How is MOVE Texas Civic Fund evaluating the**
22 **impact of new electoral maps on college campuses?**

23 A. I don't know if we are evaluating the impact
24 of that. I think that we are educating young people on
25 if they are interested in redistricting in their area or

1 their campus, we are showing them the ways they can be
2 involved in that.

3 **Q. Then it talks about diminished and diluted**
4 **representation. Whose diminished and diluted**
5 **representation is MOVE focused on?**

6 MS. MARZIANI: Objection. Vague.

7 MS. MACKIN: Q. You can answer if you
8 understand my question.

9 A. We believe that young people need to be
10 involved in our democracy.

11 **Q. Do you know approximately what percent of**
12 **MOVE's issue advocacy resources are being dedicated to**
13 **this redistricting project?**

14 A. I do not know the percentage or the dollar
15 amount off the top of my head, but it's a very small
16 amount.

17 **Q. I neglected to ask that question about the**
18 **Democracy Done Right project. Do you know the**
19 **approximate percent of the issue advocacy resources that**
20 **MOVE has dedicated to the Democracy Done Right project?**

21 A. Democracy From the Ground Up is the largest of
22 these three projects.

23 **Q. I'm sorry, I just want to be clear on the**
24 **record. It was my understanding that Democracy From the**
25 **Ground Up redistricting and Census were subprojects of**

1 **Democracy Done Right?**

2 A. Democracy -- just to clarify, Democracy From
3 the Ground Up is the largest of the Democracy Done Right
4 campaigns or projects.

5 **Q. Got it. Okay.**

6 **Then the third project or sub campaign listed**
7 **here is "Census."** **Why is MOVE pursuing an issue**
8 **advocacy campaign related to the Census?** **I think I can**
9 **probably guess what the answer is going to be, but**
10 **asking for the record.**

11 A. We believe that young people are often
12 undercounted in the Census, and so we are actively
13 encouraging young people across the areas we work at to
14 fill out the Census.

15 **Q. And how are you encouraging them to do that?**

16 A. That is done a multitude of ways. Mostly
17 social media, especially in this era of like the
18 COVID-19 now where we aren't interacting with people in
19 the field. But we are also doing phone calls and text
20 messages on them.

21 **Q. Then would you be able to tell me the**
22 **approximate percent of MOVE Texas Civic Fund's issue**
23 **advocacy resources that are being dedicated to this**
24 **Census project?**

25 A. If I can -- if I rank them from like size

1 level from a financial standpoint, Democracy From the
2 Ground Up is number one, Census is number two, and
3 redistricting is number three under Democracy Done
4 Right.

5 Q. But you couldn't give me a specific dollar
6 amount? I'm not suggesting you need to be able to. I'm
7 just trying to ascertain if it exists.

8 A. I do not have that information off the top of
9 my head.

10 Q. Would it be possible to get it?

11 A. I'm not sure.

12 Q. Let's jump down to MOVE 10.

13 And just as a housekeeping matter, I think
14 that when I get through this PowerPoint, I think it
15 might be a good time to take a quick break for lunch. I
16 don't think I can get through everything else that I
17 have without, you know, us taking a lunch. If that's
18 okay with everybody, we can plan on that.

19 Oh, actually, you mentioned something that I
20 want to come back to quickly. How is COVID-19 impacting
21 MOVE Texas Civic Fund? How is it impacting your
22 activities?

23 A. It's impacting us greatly. We are working
24 completely remote at this time per the governmental
25 guidelines and our organizational guidelines. Out of

1 the Civic Fund's general activities, voter registration
2 has taken the largest impact of that because of a lack
3 of digital infrastructure at the state level. So
4 therefore, if we can't meet voters in the field and ask
5 them to sign the application, then that work stops.

6 **Q. Back to 10, this list still under issue**
7 **advocacy, "We the Young People," is that another large**
8 **campaign area like Democracy Done Right?**

9 A. That is correct.

10 Q. And then listed under that, I see "Criminal
11 Justice Reform Work," "Climate Justice," and
12 "Immigration Work." Would it be fair to say those are
13 projects or sub campaigns of We the Young People?

14 A. That is correct.

15 Q. Okay. How does the Criminal Justice Reform
16 Project further the mission of MOVE Texas Action Fund --
17 MOVE Texas Civic Fund rather? I'm sorry.

18 A. We believe that young people should be
19 involved in all aspects of our democracy and community,
20 and that work furthers that.

21 Q. And how specifically -- can you tell me a
22 little bit more about the relationship between, for
23 example, listed under "Criminal Justice Reform Work," it
24 says, "Cite and Release." How is Cite and Release
25 related to youth involvement?

1 A. Often young people are like -- are stopped by
2 law enforcement and are likely to have low-level
3 misdemeanor-type offenses that potentially could land
4 them into jail. And so, therefore, Cite and Release is,
5 you know, our policies that help, you know, that help
6 prevent that.

7 **Q. And then how about Climate Justice, how does
8 that program further the mission of MOVE Texas Civic
9 Fund?**

10 A. Our fellows are interns. Our volunteers are
11 passionate about climate and see that as a pinnacle
12 issue of our generation. And so, therefore, they --
13 they request to work on that. That's an issue that they
14 like.

15 **Q. How about Immigration Work, how does -- how
16 does the Immigration Work project further the mission of
17 MOVE Texas Civic Fund?**

18 A. We have several -- several -- we've had
19 members who are fellows and interns and volunteers
20 before who are DACA students or who come from families
21 of immigrants or may be immigrants themselves, and so
22 this work is another way that they ensure that their
23 voice is heard.

24 **Q. And these three projects we just talked about,
25 are you able to tell me what percent of the issue**

1 **advocacy resources of MOVE Texas Civic Fund are**
2 **dedicated to each of these projects?**

3 A. Like the previous campaign, I can rank them by
4 scale. Climate Justice would be number one, Criminal
5 Justice would be number two, and Immigration Work would
6 be number three.

7 Q. **But you can't give me a dollar amount?**

8 A. Not off the top of my head.

9 Q. **And do you know if it would be possible to**
10 **identify a dollar amount?**

11 A. I'm unsure about that.

12 Q. **Okay. Who developed MOVE's positions on these**
13 **issues?**

14 A. These are policy issues that were identified
15 from the student level or volunteer level from the
16 grassroots.

17 Q. **The people who developed these policy**
18 **positions would be who specifically?**

19 A. These -- so, for instance, students have
20 identified that climate justice is a major -- is a
21 major, like, issue for them. And so we often have town
22 halls. We have listening sessions. We have student
23 organizations that meet and come together and say, for
24 instance, "It is tying CEO pay to emissions reductions
25 possible in this city," say, for instance, San Antonio.

1 And then if that's the case, then that is
2 potentially a -- either a policy area campaign that is
3 then run by young people.

4 **Q. Very cool. I just have one more question on**
5 **this document.**

6 Down on MOVE 17, the last bullet point talks
7 about proactively mailing voter registration forms and
8 information to eligible residents who aren't registered
9 to vote. Is that still an initiative that MOVE Texas
10 Civic Fund is pursuing?

11 A. We do undertake that activity, and it is a --
12 it is a like -- it is an opportunity for us to reach
13 more voters, especially in rural areas.

14 **Q. And how does MOVE identify those individuals**
15 **who it's going to reach out to with a voter registration**
16 **application?**

17 A. We identify them by age. So we do not qualify
18 them by political affiliation or party or previous
19 voting history or anything like that. We qualify them
20 by age.

21 **Q. Where do you get that data?**

22 A. We get the data from either like they,
23 theirself [sic], identify that data. And so, for
24 instance, they will fill out a Pledge to Vote card for
25 us that says they need to register to vote. Or we

1 utilize, say, for instance, consumer-level data, that
2 kind of stuff.

3 MS. MACKIN: All right. I think this is a
4 good spot for us to take a break. I probably have about
5 an hour and a half to go. Maybe a little bit more.

6 So how long do folks feel like they need for
7 lunch? I mean, I can take an hour. I can do it
8 quicker, too.

9 MS. MARZIANI: I don't think we need a whole
10 hour, especially because most of us can walk around.

11 MS. MACKIN: Go to the kitchen. Go to the
12 microwave.

13 MS. MARZIANI: There are advantages. We don't
14 have to stand in line at the rush hour.

15 MS. MACKIN: Exactly.

16 MS. MARZIANI: You want to come back at 12:45?

17 MS. MACKIN: That sounds great.

18 THE WITNESS: That works for me. Thank you.

19 MS. MARZIANI: Just a small housekeeping
20 matter, I remember the deposition on Tuesday that the
21 tech folks say it was better for us to mute and turn off
22 our video rather than leave the meeting. I don't know
23 if that's still correct. I wanted to advise everybody
24 on the line that's what we should.

25 THE REPORTER: Anna, do you want me to go off

1 the record?

2 MS. MACKIN: Yes, let's go off the record.

3 (Whereupon, the lunch recess was taken at
4 12:06 p.m.)

5 -----oOo---

6 AFTERNOON SESSION

7 (Time noted: 12:48 p.m.)

8 MS. MACKIN: Q. All right, Mr. Galloway. I
9 want to ask you one thing that I forgot to ask you at
10 the beginning of the deposition.

11 You mentioned that you had staff look for
12 documents to respond to the subpoena and pull them. And
13 I was just hoping to get the name of the person who you
14 had asked to pull documents and what you asked them to
15 look for.

16 A. So if I understood your question, you are
17 asking about our search for the documents for the
18 deposition; is that correct?

19 Q. Yes. That's right.

20 A. We e-mailed all full-time employees and asked
21 them to search for a variety of terms and search in
22 specific places, including their e-mail, their Google
23 drive, and their computer hard drive. And then they
24 uploaded all of those documents to a Google folder where
25 our lawyers reviewed them.

1 Q. Okay. Do you know what terms they used?

2 A. Let's see. Off the top of my head, I believe
3 it was "voter registration," "driver's license,"
4 "driver's license and voter registration." I believe
5 those were the three main terms.

6 Q. Okay. Thank you for that.

7 Pivoting back to these documents, and as we
8 did with the previous document, take your time to look
9 over the Bates range. I just want to clarify where each
10 document begins and ends.

11 So I've taken a look, and it looks to me like
12 MOVE 20 through 40 is one single PowerPoint. If you
13 wouldn't mind reviewing that and letting me know if that
14 appears to be the case?

15 A. I believe, like, document Nos. 20, 21, 22, 23

16 --

17 Q. I'm sorry, I misspoke. Did I say 20 through
18 40?

19 A. That's correct.

20 Q. I meant 24 through 40, I apologize.

21 A. Sure. Let me review those, and I'll confirm.

22 Q. Sure.

23 A. (Reviewing document.) That is correct, 24
24 through 40.

25 Q. What is this PowerPoint, 24 through 40, used

1 **for?**

2 A. This looks to be similar content to the
3 previous PowerPoint, which is talking about, like, our
4 education, leadership development, and issue advocacy
5 programs, with a focus on, like, voting and Democracy
6 From the Ground Up.

7 **Q. Do you know who developed this PowerPoint?**

8 A. I believe timeline-wise, this is older than
9 the PowerPoint that is above it. And -- but this was
10 most likely worked on by our leadership development
11 manager and our political director.

12 **Q. And do you know when this PowerPoint was
13 developed?**

14 A. I want to say the timeline is roughly 2019.

15 **Q. Do you know if there are prior versions of
16 this PowerPoint? And I don't mean drafts. Let me be
17 clear. I mean another camera-ready version that was
18 presented to people receiving this training.**

19 A. Not to my knowledge. There might be bits and
20 pieces of this in other types of materials, but this is
21 part of, like, our just general civic leadership
22 programming.

23 **Q. So who receives this training?**

24 A. Very similar to the first PowerPoint, this
25 training is designed for staff, fellows, interns and

1 volunteers.

2 **Q. Who presents this training?**

3 A. Depending on the audience, this could be
4 presented by our advocacy team members, or this could be
5 presented by, like, some of our field team members if
6 like say, for instance, they were talking to students
7 about how to get involved.

8 **Q. Do you know how frequently this training is
9 offered?**

10 A. At the minimum, it would be once a semester.
11 But depending on the audience, it could be more than
12 that.

13 **Q. Okay. So if it were used for staff, would it
14 be used for on-boarding purposes or what?**

15 A. Quite possibly it could be used as like a
16 reference material for on-boarding, but the more likely
17 version of this is that as our fellows begin to learn
18 about some of the various issues that we work on or that
19 we, you know, how let's say, for instance, the voting
20 rights like, you know, timeline has played out, like,
21 this would be an opportunity to teach them.

22 **Q. When you say "voting rights timeline," what do
23 you mean?**

24 A. Just like, you know, going all the way back
25 to, like, who was allowed to vote, when the country was

1 founded to, like, women's suffrage, to, you know, when
2 Civil Rights era.

3 **Q. Voting Rights Act, all --**

4 **A. Yeah.**

5 **Q. Okay. And what bucket of activity -- we**
6 **talked about the three main buckets before lunch. What**
7 **bucket of activity would this training fall under?**

8 **A. This, depending on audience, could fall under**
9 **a couple of different buckets. This could be leadership**
10 **development as we're training fellows and interns or**
11 **even staff development. It also could be, if it's given**
12 **to, say, students or to volunteers, it could be part of,**
13 **like, an issue advocacy program as well.**

14 **Q. I'm sorry, I'm not trying to mischaracterize**
15 **your testimony. I just missed it. You said that this**
16 **could fall under issue advocacy or possibly --**

17 **A. Are you referring to the sentence I just said?**

18 **Q. Just, I think that you said it could fall**
19 **under -- potentially under two of the three buckets,**
20 **depending on the audience?**

21 **A. Yeah. That would be, like, leadership**
22 **development, which is where, like, educating our fellows**
23 **and our interns would be housed at. Or like, let's say,**
24 **for instance, if this was part of a Democracy From the**
25 **Ground Up presentation, that would fall under MOVE Texas**

1 Civic Fund's issue advocacy work.

2 Q. Okay. Cool.

3 Jump down to MOVE to 27, talking about civic
4 education and grouping that into voter registration,
5 voter education, and voter mobilization. You say
6 that -- I'm sorry if I'm asking you things that we've
7 already talked about. I just want to make sure I'm
8 clear. Would you say -- so we talked about the fact
9 that voter registration activities fall under civic
10 education; right?

11 A. That is correct. Voter registration
12 activities are 100 percent (c)(3) activity under civic
13 education. That would be MOVE Texas Civic Fund.

14 Q. Then in addition to voter registration, voter
15 education activities by MOVE Texas Civic Fund also fall
16 into that civic education bucket; is that right?

17 A. That's correct. And so the majority of voter
18 education work for us is 501(c)(3) compliant, and so
19 that is an opportunity -- like, that would also fall
20 under MOVE Texas Civic Fund.

21 Q. I'm looking at slide 27, "Voter Registration,"
22 "Voter Education," and "Voter Mobilization," underneath
23 the "Civic Education" bucket.

24 Would it be fair to say that those three
25 activities, voter registration, voter education, and

1 voter mobilization, all fall into that civic education
2 bucket of activities that MOVE Texas Civic Fund pursues?

3 A. Yes. MOVE Texas Civic Fund, one of our core
4 missions is to increase civic education. And we do it
5 through these three ways.

6 Q. Are there any other ways?

7 A. These are the three ways that we categorize
8 improving civic education.

9 Q. Okay. And I want to talk about each of those
10 sub buckets, if you will. Underneath "Voter
11 Registration," three items are listed: "Class Raps,"
12 "Tabling," and "Canvassing."

13 Are those the types of voter registration
14 activities that MOVE Texas Civic Fund pursues?

15 A. Those are three types of voter registration
16 activities that occur. I would argue three of the most
17 common type. And so, yes.

18 Q. Just to be clear, you said they occur. MOVE
19 Texas Civic Fund pursues them; right?

20 A. MOVE Texas Civic Fund, yes, part of our
21 mission pursues and directs them.

22 Q. Are there any other voter registration
23 activities other than Class Raps, Tabling and Canvassing
24 that MOVE Texas Civic Fund is involved in?

25 A. Yes. Let's say, for instance, if there is a

1 concert, and so we would do voter registration at a
2 concert. Or, like, let's say, for instance, there is a
3 community event, then we would go to that community
4 event, which would probably fall under Canvassing or
5 Tabling, depending on the sort of mechanism that's
6 chosen there. But there are more nuanced versions of
7 voter registration, but they kind of all fall into at
8 least those three big buckets.

9 **Q. So yeah, not trying to do a "gotcha" on these**
10 **specific permutations. Just kind of it's helpful to**
11 **have these general categories so I make sure I**
12 **understand the scope of the MOVE Texas Civic Fund voter**
13 **registration efforts. So I just kind of want to ask**
14 **again to close the loop.**

15 **Would it be fair to say that all of MOVE Texas**
16 **Civic Fund's voter registration activities could be**
17 **classified as Class Raps, Tabling or Canvassing?**

18 A. Yes.

19 Q. Okay. Tell me about Class Raps.

20 A. Class Raps is a term that we use for class
21 presentations.

22 Q. You actually rap?

23 A. We do not actually rap.

24 Q. That is disappointing.

25 A. I know. We got to improve on that.

1 It's basically a class presentation. We will
2 go into -- we will ask permission from professors to
3 take five to ten minutes of the first part of their
4 class, go in, and explain to students that they have a
5 powerful voice as a voter. And then we will ask them to
6 register to vote or pledge to vote if they're already
7 registered to vote. That all happens in that activity.

8 **Q. And why the name "Class Raps"?**

9 A. "Raps" is just a more fun way of saying
10 presentation.

11 **Q. How frequently would you say that MOVE Texas
12 Civic Fund engages in these Class Raps?**

13 A. It's a large portion of our voter registration
14 work or at least pre COVID-19. We have worked hard to
15 build the trust of college professors and high school
16 teachers and community college professors. And so
17 therefore, they allow us to come in and present to their
18 class.

19 **Q. How -- how does MOVE Texas Civic Fund
20 cultivate those relationships with educators who then
21 kind of facilitate the Class Raps happening in their
22 classroom?**

23 A. That can happen in a couple different ways.
24 For instance, our field organizer or maybe one of the
25 managers, regional organizing managers could introduce

1 themselves to a professor and build that relationship.
2 Maybe one of our fellows or interns could introduce
3 themselves and build that relationship.

4 Or often other professors hear about how
5 excited, you know, other professors are with the job
6 that we did in their classroom, and they will either
7 reach out to us to invite us in or we will reach out to
8 them.

9 **Q. Could you estimate a percentage of MOVE Texas**
10 **Civic Fund voter registration activities that fall into**
11 **this Class Raps category?**

12 A. Voter registration is our largest bucket of
13 work within MOVE Texas Civic Fund as a whole, and Class
14 Raps are honestly probably one of the largest buckets
15 underneath "Voter Registration." So I would say out of
16 our entire voter registration efforts, Class Raps easily
17 probably would make up 50 percent of our voter
18 registration.

19 **Q. Okay. And tell me about MOVE Texas Civic**
20 **Fund's "Tabling" voter registration efforts?**

21 A. Tabling is a strategy where we set up a table,
22 and like often on a college campus, you know, or on a
23 community college campus, maybe even in a high school
24 cafeteria during lunchtime. And our organizers invite
25 people over to the table to learn about registering to

1 vote, to actually register to vote, to pledge to vote,
2 and to maybe, like, pick up stickers or buttons or
3 something like that.

4 **Q. When you say "actually register to vote," what**
5 **does that process look like? Do you have the**
6 **registration applications there? Or kind of what are**
7 **the mechanics of that?**

8 A. The first thing the organizer says is, "Are
9 you registered to vote at your current address?" And if
10 the person says no, then they will say, "Would you like
11 to register to vote today? We can help you within two
12 to three minutes." And they invite the person over to
13 the table where there are paper voter registration
14 applications compliant with individual county elections
15 administrator's rules and regulations.

16 And they then help the person, you know, fill
17 out the form, answer any questions, ensure that the form
18 is compliant under the -- all of the Election Code, and
19 additionally, under the voter deputization requirements.

20 And then they, as a voter deputy volunteer,
21 then sign the receipt, hand the receipt to the voter,
22 and then take the voter's application, store that in a
23 secure place, where it's then dropped off at the county
24 elections department within five days per the
25 regulations.

1 **Q. And so each time MOVE Texas Civic Fund has a**
2 **tabling event for voter registration, do you have a**
3 **volunteer deputy registrar present at the event?**

4 **A. Yes. All of our fellows, interns, staff**
5 **members, are all volunteer voter deputy registrars.**

6 **Q. So could you register me to vote today?**

7 **A. What county do you live in?**

8 **Q. Travis.**

9 **A. I am registered -- I can register people in**
10 **Travis County.**

11 **Q. I am registered, but...**

12 **A. I'm glad.**

13 **Q. But it's good to know that no task is too**
14 **small for the executive director.**

15 **A. No. You will often find me out in the field**
16 **days before the voter registration deadline.**

17 **Q. At these tabling events, do -- does MOVE Texas**
18 **Civic Fund keep track of how many people it registers at**
19 **each event?**

20 **A. That's correct. Yes, we do.**

21 **Q. And how do you track that?**

22 **A. We track that through a couple of different**
23 **ways. Through the number of voter registration**
24 **completed applications that we had during that shift,**
25 **and then also we track other things like Pledge to Vote**

1 cards, which that is a count as well. And then our
2 organizers take that information, fill out a quick form
3 on the voter registration shift so we can track that
4 information.

5 **Q. And does MOVE Texas Civic Fund follow up with**
6 **the folks on whose behalf you've submitted a voter**
7 **registration application?**

8 A. We're, by state law, only required -- only
9 allowed to take the name and the, you know, the address
10 of the person like of the information off the voter
11 registration card. So we can't -- we do not in any way,
12 you know, record, say, their birth date or their phone
13 number or any contact information.

14 So the way that we follow up with voters is if
15 they opt into a program called Pledge to Vote. At that
16 point, they will give us their preferred method of
17 contact. Maybe they want election reminders via
18 cellphone SMS, or they want a phone call, or they would
19 prefer e-mail. And that's where we collect that
20 information.

21 **Q. And what do you use that information for?**

22 A. A variety of things. Sometimes they will say
23 that they want to volunteer, and so we invite them to
24 volunteer. We will, if they check that they would like
25 elections reminders or elect for that, then we will

1 remind them of upcoming elections and the dates and if
2 they need mail-in ballots or things like that. So it's
3 a variety of issues.

4 **Q. Okay. And what percentage, roughly, of**
5 **MOVE Texas Civic Fund's voter registration activities**
6 **would you say fall into the Tabling category?**

7 A. Class Raps are 50 percent. I would estimate
8 that Tabling is about 30 percent.

9 **Q. I guess, let me go back to something I didn't**
10 **ask you about the Class Raps, but I'm curious.**

11 **At the Class Raps, do ya'll engage in a**
12 **similar process as you do when you are tabling, such**
13 **that individuals have -- you send a volunteer deputy**
14 **registrar and individuals have an opportunity to**
15 **complete an application right there, right then?**

16 A. That is correct. All of our staff, fellows,
17 and interns are deputized in the county and surrounding
18 counties that they work in. And so, therefore, they are
19 able to complete those forms directly in the class.

20 **Q. Okay. And then tell me about Canvassing.**
21 **What is that?**

22 A. Canvassing is an activity that rather than
23 having a centralized place to go, whether that's a
24 classroom or a table on campus, Canvassing involves
25 having voter registration materials and walking around

1 and directly talking to people like on foot.

2 Q. By my math, if Class Raps are 50 percent of
3 MOVE Texas Civic Fund's voter activities and Tabling is
4 about 30 percent, would that make Canvassing about
5 20 percent?

6 A. That is correct.

7 Q. Okay. Is it the same process where because
8 the canvasser is a volunteer deputy registrar, they can
9 register the individuals that they interact with on foot
10 there and then, that day, if the individuals wish to be
11 registered?

12 A. Often there are some situations, like, let's
13 say, for instance, if we are working at a very large
14 concert and that concert hypothetically is in Dallas
15 County, those organizers are often deputized in Dallas
16 County and the surrounding counties, Tarrant, Collin,
17 Denton, et cetera.

18 But let's say somebody from Harris County came
19 to the concert all the way from Houston. And so when we
20 ask them, "Are you registered to vote in your current,
21 like, in your current residence," and they're like, "I'm
22 not, but I'm from Harris County or I'm from Houston," if
23 that person is not deputized in Harris County, they are
24 unable to register that person to vote.

25 Q. Okay. And so when MOVE Texas Civic Fund is

1 **engaging in these voter registration activities through**
2 **either Class Raps, Tabling or Canvassing, do you check**
3 **to verify whether the individual is already registered**
4 **before getting them registered?**

5 A. Occasionally, we'll have some people that say,
6 "I am registered to vote," and our organizers are
7 trained to say things like, "That's great. When did you
8 register," or, "Did you register, like, recently," or,
9 "Have you moved since you've registered?"

10 That creates a little bit of like a loose
11 dialogue, similar to like the block-walking script you
12 saw a little earlier, that they have to, like, navigate.
13 And say, for instance, that is where often we'll learn
14 they're from a different county, and we can't help them,
15 and then we will give them some information of maybe how
16 to go to the Secretary of State's website or how to use
17 our digital tool or something like that.

18 And then say, for instance, we sometimes hear
19 of, like, "I registered to vote, but I registered to
20 vote when I renewed my driver's license," and then we
21 have to proceed through a line of questioning of, like,
22 "Well, when you did that, did you complete the form,
23 print it out, and mail it in?" Or is there like a
24 misunderstanding of thinking they can check the box and
25 go.

1 And so, like, those are all, like, nuanced
2 conversations that happen, you know, orally.

3 **Q. Did ya'll make any record of those**
4 **conversations? Like each individual that is interacted**
5 **with, do you record kind of the nature of the**
6 **conversation?**

7 A. We do not. The scale, unfortunately, isn't
8 able to be able to, like, capture that nuance for
9 voters. We registered 30,000 people in 2018 and 25,000
10 in 2019. Because of that, we often are -- we often are
11 attempting to, you know, like, solve whatever issue that
12 comes up, that kind of thing.

13 **Q. So do you record -- I think you maybe answered**
14 **this already, but I just want to make sure.**

15 **Do you record whether or not each individual**
16 **that you register, you know, for instance, whether they**
17 **have just moved from a different county to the new**
18 **county?**

19 A. No. **The only thing we register per shift is**
20 **typically the voter registration application, the number**
21 **of those that were completed, and the number of Pledge**
22 **to Vote cards that were completed. We also monitor how**
23 **many people say they want to volunteer with us.**

24 **Q. And so the -- you mentioned a moment ago a**
25 **digital tool. Tell me about that.**

1 A. We utilize a digital tool called Register to
2 Vote that is on our website. That is
3 MOVETexas.org/register. And we're using that tool more
4 now that we cannot reach voters in person.

5 But this is a tool that allows them to fill
6 out some basic information and then have a prepopulated
7 voter registration card mailed to their address and then
8 have a pre postage-paid envelope that they can mail it
9 back to the Secretary of State.

10 Q. **Do you know who pays the postage on those
11 postage-prepaid applications?**

12 A. MOVE Texas Civic Fund pays per voter that
13 fills out that tool.

14 Q. **Oh, okay. So MOVE Texas Civic Fund pays, I
15 guess, the owner or creator of the digital tool?**

16 A. It's a vendor and -- that we have a contract
17 with.

18 Q. **What is the name of the vendor?**

19 A. The vendor's name is Civitech.

20 Q. **Thank you.**

21 Okay. So I -- I don't necessarily need to go
22 into any more detail in each of these buckets under
23 "Civic Education" looking at slide 27. But are you able
24 to estimate within MOVE Texas Civic Fund's expenditures
25 on civic education which percentage goes to voter

1 registration, which percentage goes to voter education,
2 and which percentage goes to voter mobilization?

3 And it's okay if the answer is no. I'm not
4 asking you to guess, but if you can give a rough
5 estimate.

6 A. A rough estimate would be roughly 70 percent
7 voter registration; 20 percent voter education;
8 10 percent voter mobilization.

9 Q. And what is that estimate based on?

10 A. I believe that estimate is based on like just
11 the general -- the general scope of the work. We do
12 voter registration all year long. Voter education is
13 populated in between those times. Maybe one or two
14 events per city per month. And then voter mobilization,
15 as you know, is like specifically around, like, voting
16 election time, that kind of thing.

17 Q. Okay. All right.

18 I'm sorry if you mentioned this. Who
19 developed this PowerPoint?

20 A. I did already mention that.

21 I believe it was developed by our leadership
22 development manager and our political director.

23 Q. Do you know if either of those folks is an
24 attorney?

25 A. They are not attorneys.

1 Q. So it appears to me, moving on down the stack,
2 that pages MOVE 41 through MOVE 44 are a single
3 document. But let me know if I am misunderstanding
4 that.

5 A. That is correct.

6 Q. **What is this document used for?**

7 A. Just one second. I'm going to review it.

8 Q. **Sure. Take your time.**

9 A. (Reviewing document.) This looks to be a
10 block-walking instruction, block-walking script, if
11 that's the right term, for voter registration.

12 Q. **Do you know who developed this document?**

13 A. It most likely was developed by our field
14 leadership, which could have been our regional
15 organizing managers who are, at this time, you know,
16 when this document was most likely developed, Raven
17 Douglas was serving as our deputy director who was
18 overseeing, like, field and advocacy. And so this --
19 she probably had some point to do with this as well.
20 But this is a very in-depth field document.

21 Q. **How does MOVE Texas Civic Fund use this
22 document?**

23 A. This document is used to train volunteers,
24 interns, fellows, and even potentially staff on how to
25 block-walk for voter registration, is what it appears to

1 be. And additionally how to stay safe in those
2 environments, how to engage in conversations. Again,
3 how to have more, like, nuanced conversations, what we
4 call deep canvassing conversations.

5 **Q. And so would this document fall into the civic**
6 **education bucket of activity, specifically voter**
7 **registration?**

8 A. That is correct.

9 Q. Moving right along. It looks to me like
10 pages MOVE 45 through MOVE 80 are a single PowerPoint
11 presentation. Please take the time you need to look at
12 those pages and let me know if my understanding appears
13 to be correct.

14 A. Could you repeat those page numbers?

15 Apparently, I missed the end date or the end one on
16 that.

17 Q. No problem. It's 45 through 80, eight-zero.

18 A. Thank you. (Reviewing document.)

19 Yes. This is -- that's correct. Those
20 numbers are correct.

21 Q. So 45 through 80 is a single PowerPoint
22 presentation?

23 A. That is correct.

24 Q. And what is this PowerPoint presentation used
25 for?

1 A. This appears to be a presentation to a high
2 school group, International School of Americas, which is
3 based here in San Antonio. Looks like it was done on
4 November 2018. And was an opportunity to present to
5 high school students about our work and how they can get
6 involved with us.

7 Q. **I'm from San Antonio, so I am familiar with**
8 **International School of the Americas. I didn't go there**
9 **just regular -- regular Clark High for me, but...**

10 A. It's a great school.

11 Q. **Claw 'em, Cougars! I can't believe I said**
12 **that out loud on the record.**

13 **Do you know who developed this PowerPoint**
14 **presentation?**

15 A. It was developed, it appears to be by our
16 regional organizing manager at that time whose name is
17 Sean Rivera, and then our now political director but
18 then deputy director Raven Douglas, in conjunction with
19 our volunteer coordinator, who her name is -- she's no
20 longer with the organization, but her name is Elizabeth
21 Wootens.

22 Q. **And do you know if it has, like, a similar**
23 **version of this PowerPoint has been used in other**
24 **schools, or was this only used for International School**
25 **of the Americas on November 27th, 2018?**

1 A. This specific PowerPoint looks very specific
2 to that actual visit, but there are elements of this
3 that are potentially being shown, like as part of our
4 high school outreach or college outreach.

5 **Q. And what bucket of activity would this
6 presentation fall under?**

7 A. This would be civic education and would most
8 likely fall under, you know, like, depending on the age
9 of the students, it could be voter registration. It
10 could be -- mostly, this is voter education materials.
11 And then additionally, there could be, like, some
12 opportunities to talk about leadership development in
13 this. So that could be another part of that bucket of
14 programming.

15 **Q. And so do you know, for example, like how Sean
16 would have coded his time for developing and presenting
17 this presentation?**

18 A. Yeah. He would have coded his time as, you
19 know, let's say this was a two-hour presentation. He
20 would have coded it most likely half (c)(3) civic
21 education, half (c)(3) leadership development.

22 **Q. And within civic education, would he have
23 coded it any more specifically than that?**

24 A. We -- often we don't have further codification
25 of the time cards. So it's just -- it's really just --

1 Q. The main point is determining whether it's
2 (c)(3) or (c)(4) activity?

3 A. That's correct.

4 Q. All right. I want to just quickly touch on
5 **MOVE 52.**

6 A. One second. I just need to get there. I'm
7 sorry.

8 Q. No problem.

9 A. Yes.

10 Q. Now, I have not compared the documents side by
11 side, so I'm not sure, but does this appear to reflect
12 the current organizational structure of MOVE Texas Civic
13 Fund?

14 A. No, because this was nearly a year and a half
15 roughly ago, so our structure has changed.

16 Q. And it is accurately reflected on that page we
17 looked at earlier, MOVE 363?

18 A. The organizational chart that is -- that was
19 produced at the bottom of these documents is correct.

20 Q. It might not be 363. I don't remember. Let
21 me make sure.

22 A. I believe it's 361.

23 Q. Okay. Yes. Okay. Thank you. All right.

24 Jumping down to -- actually MOVE 58.

25 A. Yes. I'm getting there. I'm here. Yes.

1 Q. So MOVE 58 lists a few metrics for -- well,
2 appears to list a few, kind of, measures of the success
3 that MOVE Texas Civic Fund has had in its voter
4 registration efforts. It says, "In the last five years,
5 we registered 25,000 voters in the San Antonio area."

6 And now, is that -- is that figure based on
7 the records that MOVE Texas Civic Fund has kept of the
8 results of its Canvassing, Tabling and Class Raps
9 efforts?

10 A. Yes.

11 Q. Okay. And then in the second bullet, it talks
12 about increasing voter turnout by 300 percent.

13 **How was that 300 percent figure measured?**

14 A. That 300 percent measure is based on the 2017
15 municipal election in San Antonio where there was a
16 large youth voter turnout in that 2017 municipal
17 election. And we did -- and we did not only (c)(3)
18 voter mobilization, but also occasionally (c)(4) voter
19 mobilization as well.

20 Q. **And so how -- how were you able to attribute**
21 **that 300 percent to efforts by either MOVE Texas Civic**
22 **Fund or MOVE Texas Action Fund?**

23 A. We did voter turnout work inside that
24 election. And so -- and then we monitored the number of
25 under-30 voters that increased.

1 Q. And since, presumably, you were the main group
2 trying to get folks under 30 to the polls?

3 A. That's correct.

4 Q. Makes sense.

5 Then this third bullet, "In 2016, 68 percent
6 of the people we registered turned out to vote."

7 How did you identify that 68 percent figure?

8 A. So we -- we take the voters that we register,
9 and we match them to the county voter registration mast,
10 or like voter, like the voter mast, and then we can see,
11 like, did this person turn out to vote. And so that's
12 how that number, and in the 2017, 71 percent of the
13 people we registered vote.

14 Q. You said you compare it to the voter -- I
15 didn't understand that word.

16 A. Sure. It's called mast, m-a-s-t.

17 Q. Okay.

18 A. It's like open records document, or
19 information that the counties release on, like, the
20 names of people who voted, early voting, and then who
21 ultimately vote on Election Day. You can't see how they
22 voted or that type of thing. You can just see did they
23 actually vote.

24 Q. I'm sure that keeps some of your interns very
25 busy certain times of the year doing that matching.

1 **The fourth bullet, "This year, we registered**
2 **over 29,000 new voters."**

3 **Now, again, this was prepared in 2018; is that**
4 **right?**

5 A. That is correct. In 2018, we registered
6 nearly, like, very, very close to 30,000 voters.

7 Q. **And I understand how you tracked the number of**
8 **the total number of registrations that resulted from**
9 **your efforts. How did you know that those voters were**
10 **new voters?**

11 A. Those are new voters to us. So new voters
12 that we haven't registered before.

13 Q. **So it's theoretically possible that maybe some**
14 **of them were registered before, but --**

15 A. Theoretically, some needed to change their
16 address. Theoretically, their dorm was moved or
17 something like that and needed to update that
18 information. The vast majority of the folks that we
19 register are often first-time voters or not registered
20 to vote. But there are -- there are folks that, you
21 know, come to us often to update their address or
22 something like that.

23 Q. **So this 29,000 new voters, "new" in that**
24 **context means you hadn't interacted with them before?**
25 **MOVE Texas hadn't registered them to vote before?**

1 A. That is correct. So we designed that as
2 like -- it's not like we registered them in 2017 and
3 then 2018, and then we registered them in 2019.

4 **Q. You're not counting credit for them --**

5 A. Yeah.

6 **Q. -- over and over?**

7 **I gotcha. Okay. That is amazing, youth**
8 **midterm turnout was 500 percent.**

9 A. That was statewide in the 2018 November
10 midterm.

11 **Q. That's awesome. Okay.**

12 **I am jumping down to MOVE 73.**

13 A. Yes.

14 **Q. Okay. I am curious about statement 1. It**
15 **says, "Texas is the most difficult state to register**
16 **voters in the country."**

17 **What is that based on?**

18 A. That's based on a wide variety of research,
19 predominantly by places like the Brennan Center and
20 other research organizations that monitor voter
21 registration across the United States. But there's
22 other states that have pretty restrictive laws as well.

23 But once you add up the voter registration
24 laws, the voter deputization laws, and access to voter
25 registration, Texas is like ranked as the most

1 difficult.

2 **Q. And that was by the Brennan Center you said?**

3 A. I'm sure that we used multiple different
4 sources for that because, like I said, it's, you know --

5 **Q. It's widely studied?**

6 A. Exactly.

7 **Q. Fair enough, okay.**

8 **Then down on point 3, it says, "Each county
9 elections department in Texas has its own rules and
10 regulations for registering voters."**

11 **What is that a reference to?**

12 A. That's a reference to county elections
13 administrators requiring different forms to be used.
14 Often it's the same content of the form, but it might be
15 on a different type of paper. And so, for instance, I
16 believe Travis County prefers yellow sort of flimsy
17 paper. And Bexar County prefers like cardboard, sort of
18 like white heavier card stock paper.

19 And so how that comes into play is, like, if
20 the county runs out of voter registration applications,
21 which is a pretty common occurrence, it's much more
22 difficult for us to print voter registration cards in
23 that area or in that county. Also, there's some
24 counties that require, let's say, for instance, just a
25 receipt to be given to the voter, which is compliant to

1 local law.

2 Say, for instance, Bexar County has a
3 perforated receipt at the bottom of the voter
4 registration. Meaning, Guadalupe County requires an
5 actual, like, log of voters registered. And so anybody
6 deputized in that county has to understand those
7 specific rules and how that county manages the reporting
8 aspect and return of the voter registration cards by the
9 volunteer voter deputy.

10 **Q. Is a volunteer deputy registrar allowed to use
11 the voter registration application that the Texas
12 Secretary of State publishes?**

13 A. To my knowledge, there's several that they
14 publish. I believe they publish a specific high school
15 one that's sent to high schools. And then I think they
16 have like a standardized one and that kind of thing.

17 If it's a mail-in form, then that mail-in form
18 must be given to that voter, and they fill it out and
19 mail it in, if that makes sense.

20 **Q. I see. Yeah. So like a volunteer deputy
21 registrar, are you saying they can't just say, "Here's
22 the Secretary of State form. Fill it out. I'm going to
23 take it from you and take it back to the county"? That
24 voter would have to then send it on to the Secretary of
25 State to be sent to the county?**

1 A. I believe there are certain counties that
2 allow taking a mail-in form and writing a handwritten
3 receipt to it and then writing the information on the
4 bottom, handing that handwritten receipt back, and then
5 turning that card in as like a deputized form. But that
6 is -- we don't do that practice. We utilize forms from
7 the county.

8 Q. Then the last point, point 4, "Voter turnout
9 is intersectional." Then it lists some statistics that:
10 "People of color are less likely to vote compared to
11 white voters." "Lower income people are less likely to
12 vote compared to higher income people." And those with
13 higher levels of degrees "...are more likely to vote
14 than someone with a high school diploma or no high
15 school diploma."

16 **Where are these -- what's the source of these
17 points?**

18 A. I'm unsure of the source of those. I'm sure
19 that those are statistics that we pulled from voting
20 rights, you know, websites or Census data, that kind of
21 stuff.

22 Q. Okay. All right. That is all I have on that
23 document. It appears to me that the next document
24 covers MOVE 81 through MOVE 135. Please take a look and
25 let me know if that seems correct to you.

1 A. Yes, just one second. Thank you.

2 Q. **Perfect.**

3 A. (Reviewing document.)

4 **That is correct, Nos. 81 through 135.**

5 Q. **This appears to me to be a PowerPoint**
6 **presentation that also includes some notes slides.**

7 **Does that -- is that consistent with your**
8 **understanding?**

9 A. That is consistent with what I understand was
10 asked.

11 Q. **And do you know what this PowerPoint is used**
12 **for?**

13 A. This seems to be a PowerPoint that is used
14 to -- as a civic education tool to not only talk about
15 the voter registration process, it appears that there's
16 steps in the PowerPoint to get others registered to
17 vote, to talk about elections, and then identify those
18 elections, like opportunities to vote after they've
19 registered.

20 Q. **Do you know how often this presentation has**
21 **been given?**

22 A. This is probably a fairly common presentation
23 that's given throughout the organization, most likely at
24 student organizations, you know. Potentially if there's
25 a longer class presentation that we're asked to give, we

1 obviously couldn't get through this in ten minutes.
2 Then just for general, like, civic education and
3 outreach.

4 **Q. And do you know who developed this
5 presentation?**

6 A. It appears that our old leadership development
7 manager Alyssa Pope and our regional organizing manager
8 Sean Rivera developed this because I can see their names
9 in the comments.

10 **Q. And I think you mentioned this earlier, but I
11 want to make sure I'm clear. This would fall into the
12 civic education bucket of activity by MOVE Texas Civic
13 Fund?**

14 A. That is correct. This is civic education and
15 voter registration. It looks like there's elements of
16 voter registration in this as well.

17 **Q. And just to make sure we're still on the same
18 page, voter registration is nested within civic
19 education by MOVE Texas Civic Fund; is that right?**

20 A. That's correct. I'm sorry, let me clarify.

21 **Q. Yeah, no problem.**

22 A. This is a civic education tool that would if
23 -- if we identified the subcategories, that would be
24 voter registration and voter education.

25 **Q. Thank you. I appreciate that clarification.**

1 All right. Moving on to the next document, it
2 appears to me that MOVE 136 through MOVE 143 are a
3 single document. Take the time you need to review it
4 and let me know if that seems right.

5 A. Thank you.

6 Q. Or it's possible that 136 through 138 are one
7 document and 139 through 143 are another. But I am not
8 quite sure.

9 A. I believe your latter assessment is correct.

10 Q. Okay.

11 A. So the first document begins on 136 and ends
12 on 138, and then the second document begins on 139 and
13 goes through 143.

14 Q. And 136 through 138, what is that document?

15 A. This looks like a general education document
16 on, like, some of our issue campaign -- advocacy
17 campaigns or advocacy issues.

18 Q. And what is this document used for?

19 A. I would assume that this document would be
20 used for like either notes for presentation or to give
21 -- to help guide a discussion on the things that
22 MOVE Texas Civic Fund works on.

23 Q. When you say "notes for a presentation," do
24 you mean like MOVE's representatives are giving a
25 presentation, and this is like the handout they give to

1 **the audience?**

2 A. No. I believe this appears to be internal
3 because of like the "Who we are" and the "Values" and
4 "How values feed into the issues" and "Issue Areas,"
5 that kind of thing. Those are two, like, the top three
6 bullet points are too vague to hand out to, like, an
7 external person without those being defined. And so
8 this looks to be like, say, an internal document.

9 **Q. And so at the top of this document, it says,**
10 **"Who we are," colon, and then it's blank, "Values,"**
11 **colon, and then it's blank, and "How values feed into**
12 **issues," colon, and then it's blank.**

13 **Can you tell me why that might be blank?**

14 A. Most likely the presenter or the organizer
15 that's presenting on this, these are issues -- these are
16 items that we talk about often. So, like, they are,
17 like, from day one taught about how to talk about MOVE
18 Texas and that we really value getting young people
19 involved, and you know, building youth power and that
20 kind of stuff.

21 So, like, I'm just assuming that whoever
22 prepared this did not need to, like, go into bullet
23 points on that because they already had it memorized.

24 **Q. All right. On page 137, under, "What we need**
25 **to get done in 2020," there's a second bullet that says,**

1 **"Call on cities and counties to explicitly endorse**
2 **student ID as voter ID."** I understand what that means.

3 Then it says "AVR." What is AVR?

4 A. AVR stands for automatic voter registration.

5 Q. So in terms of, you know, the goals for MOVE
6 Texas Civic Fund in 2020, what would that mean to have
7 automatic voter registration? What would that look like
8 in your ideal world?

9 A. Yeah. There's other states that have
10 automatic voter registration and have implemented that.
11 It's essentially a system that is built into
12 governmental databases and other, like, whether that is
13 federal government or state government or city
14 government. So that whenever, say, a -- hypothetically,
15 a mother goes to a WIC office in a state like Colorado,
16 then -- or Oregon that has automatic voter registration,
17 then if they updated their address in that system, it
18 would automatically update their voter registration
19 status using that same data.

20 And they would just receive a postcard in the
21 mail that said, "We've updated your voter registration
22 status per your change of address," you know, "on this
23 date. If you don't want to change this address, check
24 this box and drop the postcard back in the mail." That
25 would be a form of automatic voter registration.

1 Q. I see, okay. It's my understanding that,
2 like, currently when you go into a WIC office, the
3 office has to give you an opportunity to register, but I
4 think states do it differently. But in some states, you
5 have to like check a box to opt in, for example.

6 And so would this just be everyone just gets
7 registered, and it doesn't present that option to -- it
8 doesn't require you to opt in; it just happens?

9 A. Exactly. Rather than an opt-in system, it's
10 opt-out system. So everybody in the state is registered
11 to vote unless you don't want to be registered to vote
12 versus Texas that has an opt-in voter registration
13 system.

14 Q. How does that look in terms of -- the example
15 we were talking about is like a WIC office. But I don't
16 know, it seems to me there might be some people who
17 don't necessarily, for whatever reason, interact with a
18 government agency, or it might be really rare that they
19 do. How -- I mean, how ideally from your perspective
20 would they be registered to vote? I mean, this still
21 sounds like something where you have to kind of
22 affirmatively engage in an interaction with the
23 government to get registered.

24 A. Yeah. Another way I think that some states do
25 this -- I'm not, you know, I'm not an expert on

1 automatic voter registration, but I do know enough about
2 it to, like, speak on the programs and that kind of
3 thing generally. But like let's say, for instance, you
4 change your address with the USPS, U.S. Postal Service.

5 That is another government interaction that
6 would potentially spur an automatic voter registration
7 update or change. And so, you know, on average, you
8 know, like if you change your driver's license
9 information, that would then be automatically, like,
10 updated, that kind of thing.

11 Q. And I want to ask about -- so after "AVR," I
12 see the acronym "OVR." Does that stand for online voter
13 registration?

14 A. That does.

15 Q. Underneath that, there's a bullet point that
16 says, "The eight jurisdictions that implemented AVR," or
17 automatic voter registration, "in time for the 2018
18 elections automatically registered 22.2 million voters."

19 I'm sorry, go ahead, please.

20 A. I'm sorry. I think that that number is
21 2.2 million.

22 Q. Okay. The eight jurisdictions, do you know
23 what jurisdictions those are? Like do you know if those
24 are inside of Texas?

25 A. No. Texas doesn't have automatic voter

1 registration. Those would be other states that
2 implemented that. I believe some of them are --
3 Illinois is a state that has automatic voter
4 registration.

5 Q. Okay. I went to law school there. I wonder
6 if I'm on the rolls. I should probably check. Okay.

7 Starting at MOVE 139 and going down to
8 MOVE 143, that appears to be a single document; is that
9 right?

10 A. That is correct. Those numbers, again, are
11 139 through 143.

12 Q. What is this document used for?

13 A. This looks like a training agenda for our
14 field orientation, and this was from 2018.

15 Q. And who developed this document?

16 A. Again, this was most likely developed by field
17 organizers and the leadership development manager at the
18 time.

19 Q. Who would have attended -- and I'm not asking
20 for an individualized list, but just what types of folks
21 would have attended this 2018 summer orientation field
22 training?

23 A. This would be directed towards fellows and
24 interns beginning their summer semester with us and
25 would be led by the leadership development manager and

1 field organizers.

2 Q. And how did MOVE Texas decide which topics to
3 cover in this summer orientation field training?

4 A. The field organizers designed the agenda on
5 what they felt was the best things to train everybody in
6 the same settings.

7 Q. What bucket of activity would this fall under?

8 A. Since this deals with voter registration and
9 field training, which often has to do with voter
10 registration and voter education, that would be the
11 civic education bucket. And then additionally, since
12 this deals with fellows and interns, this would be the
13 leadership development bucket.

14 Q. On page MOVE 142, there's topic 4 that talks
15 about "Tabling/Canvassing Training & Pledge to Vote
16 Training."

17 A. Yes.

18 Q. When MOVE Texas Civic Fund is training people
19 on canvassing and tabling, do you talk about -- do you
20 train folks to help anybody who approaches you and asks
21 for assistance with voter registration?

22 A. Yes. We see ourselves as like a resource.
23 You know, our purpose, you know, let's say at a tabling
24 or canvassing shift is to register new voters and get
25 voters to pledge to vote. But, you know, as I mentioned

1 before, often we will have, like, voters come and ask
2 questions. And that kind of diverts us off of this like
3 sort of path of what we -- we showed up at, say,
4 San Antonio College to do voter registration and do
5 pledge to vote. But if we have to answer questions,
6 say, for instance, on voter ID, like, "Can I vote with
7 my student ID," that's a common question, then we have
8 to like step off to the side and maybe answer that
9 question so that other folks can get registered to vote.

10 But yes.

11 **Q. I'm going to jump down to what appears to be**
12 **the next document, 144 through 171.**

13 **A. Yes. That is correct. That was 144 to 171.**

14 **Q. And that appears to be a single PowerPoint**
15 **presentation; is that right?**

16 **A. That is correct.**

17 **Q. What is this PowerPoint presentation used for?**

18 **A. This looks to be additionally a civic**
19 **education PowerPoint that could be given to internal**
20 **people, let's say fellows and interns, or it could be**
21 **given publicly as well.**

22 **Q. Do you know who developed this PowerPoint?**

23 **A. I do not, no.**

24 **Q. Do you know who presents this PowerPoint?**

25 **A. This could be presented by individual field**

1 organizers. It could be presented by, say, for
2 instance, our advocacy manager if there's a specific
3 request to learn about like our Democracy From the
4 Ground Up programs. That kind of thing.

5 **Q. So what bucket of activity would this**
6 **presentation fall in?**

7 A. This would fall under civic education, voter
8 education. In addition to probably there was most
9 likely there was a voter registration ask or pledge to
10 vote ask at the end of this if it was given publicly.
11 And additionally, there are elements that would be
12 MOVE Texas Civic Fund issue advocacy.

13 **Q. On page MOVE 150, this might actually get at**
14 **how you were answering when we were talking about a**
15 **similar slide right after lunch that listed out kind of**
16 **the three buckets of sub sub buckets underneath "Civic**
17 **Education," underneath "Voter Registration," kind of the**
18 **three general types of activities.**

19 It says "Class Raps," which is the same as the
20 slide we talked about. It says "Tabling," just the same
21 as the slide we talked about. Then it says, "Free
22 Canvassing Community Events," where the previous slide
23 just said "Canvassing."

24 So is "Free Canvassing Community Events," is
25 that different from canvassing, or is it just a more

1 **fancy way to say it?**

2 A. Yeah. I believe that's like a colloquialism.

3 Canvassing ultimately is the act of walking around and
4 asking people if they would like to register to vote.

5 Free Canvassing means that you just have to do that in a
6 larger area, I would assume is the meaning of that term.

7 And as I mentioned earlier, we canvass campuses,
8 community events, like, you know.

9 Let's say, for instance, there's a farmer's
10 market. The farmer's market asks us to bring a table.
11 That would be a tabling at a community event.

12 Q. **Okay. Makes sense.**

13 **Then under "Voter Education," one of the**
14 **bullets is "Voter Guide." Can you tell me a little bit**
15 **about MOVE Texas Civic Fund's Voter Guide?**

16 A. MOVE Texas Civic Fund doesn't do a Voter
17 Guide. We do some materials that are like voter
18 education related, but our Voter Guide is done from our
19 (c)(4).

20 Q. **Okay. Gotcha. What is included in the Voter**
21 **Guide?**

22 A. Just to clarify, are you talking about MOVE
23 Texas Civic Fund's, like, voter materials, or are you
24 talking about MOVE Texas Action Fund's Voter Guide?

25 Q. **Well, I'm talking about Voter Guide, however**

1 it's being used as it appears on MOVE 150, the last
2 bullet under Voter Education.

3 A. Voter Guide, in general, is a program under
4 MOVE Texas Action Fund that we -- that we build
5 questionnaires using the issues that students care
6 about, and then we give them to all available, like,
7 running candidates to fill out, and then we take those
8 responses and either print them or put them on a website
9 and hand those out during voter mobilization, which is
10 also done under MOVE Texas Action Fund.

11 Q. Do you do that in every election? Just --
12 well, I don't want to get outside the scope, so I'll
13 leave that. I don't have anything else on that
14 document. I told you it would get faster.

15 The next document appears to begin at MOVE 172
16 and continue through MOVE 223. Please take the time you
17 need to take a look and let me know if that looks right.

18 A. (Reviewing document.)

19 Q. I would rather you be right than fast.

20 A. So that document ends on No. 223. So going
21 back up to the beginning, it begins on 172. So 172 to
22 223.

23 Q. And that is a single PowerPoint; is that
24 right?

25 A. That is correct. It looks like it's an All

1 Team Orientation from August 2018.

2 Q. Do you know whether this document was used for
3 an All Team Orientation on August 14th, 2018?

4 A. The only way that I can confirm that is that
5 it has the date on the front of it. I most likely was
6 there, but I can't recall, like...

7 Q. Okay. Fair enough.

8 Do you know who developed this document?

9 A. This was probably developed by our then deputy
10 director Raven Douglas, and then additionally, field
11 organizers and the leadership development manager.

12 Q. And do you know who attended this
13 presentation?

14 A. Since it was an all team meeting, that
15 indicates that it was staff, fellows and interns.

16 Q. It's titled "All Team Orientation."

17 Do you know why there would have been an All
18 Team Orientation held on August of 2018?

19 A. That was most likely the beginning of our fall
20 semester work.

21 Q. Okay. When you say "all team," who is
22 included in that?

23 A. As I just defined, typically "all team" is the
24 entire organization. And so that would be staff,
25 fellows and interns. Some people might come in and come

1 out of this training, but in general, it's those three
2 big buckets of folks.

3 **Q. Is something like this presented at the**
4 **beginning of every semester?**

5 A. A similar presentation to this is given every
6 single, like, semester. I'm sure that it's evolved from
7 this or, you know, but like when we start off the
8 semester with new fellows, new interns, the staff often
9 gets everybody together to like level set.

10 Q. **Then what bucket of activity would this**
11 **presentation fall within?**

12 A. This would be leadership development.

13 Q. **All right. It appears the next document**
14 **begins on page 224 and continues through page 225.**

15 **Please take a look and let me know if that is**
16 **consistent with your understanding.**

17 A. That is correct. 224 through 225, I'm sorry.

18 Q. **And what is this document?**

19 A. This is the Application For Registration for
20 an assumed business name of MOVE Texas Civic Fund in the
21 State of Oregon.

22 Q. **Have you seen this document before?**

23 A. I've seen it as part of the deposition, but
24 this is a document from the Alliance For Youth
25 Organizing.

1 Q. So do you remember if you saw it before it was
2 filed with the Oregon Secretary of State, it looks like
3 on July 26th, 2018?

4 A. The Alliance For Youth Organizing would have
5 filed this and provided us a copy of it.

6 Q. Okay. Do you -- you don't specifically recall
7 seeing it; is that correct?

8 A. I did not see this prior to it being filed
9 even though, like, it follows the guidelines of the
10 organization.

11 Q. Okay. Fair enough. And who is Sarah Audelo?

12 A. Sarah Audelo is the executive director for the
13 Alliance For Youth Organizing.

14 Q. And that is the -- you have this lovely term
15 for it that I don't want to mess up.

16 How would you describe the relationship
17 between the Alliance For Youth Organizing and MOVE Texas
18 Civic Fund?

19 A. The Alliance For Youth Organizing is our
20 501(c)(3) fiscal sponsor.

21 Q. Fiscal sponsor, okay. Thank you.

22 And then it appears on that note beginning on
23 MOVE 226 and continuing through MOVE 230, there is a
24 Fiscal Sponsorship Agreement.

25 A. That is correct. The document begins on 226

1 and ends on No. 230.

2 Q. This appears to have been executed
3 January 1st, 2018, between the Alliance For Youth
4 Organizing and MOVE San Antonio.

5 A. Yes.

6 Q. Is that right?

7 A. Yes. This is -- I'm sorry. Give me one
8 second. (Reviewing document.)

9 Q. Of course, yeah.

10 A. This is our Fiscal Sponsorship Agreement from
11 2018.

12 Q. Okay. From the document, it appears that at
13 the time -- well, let me just ask: When this document
14 was executed on January 1st, 2018, what was the tax
15 status of MOVE San Antonio?

16 A. It appears there's a typo in the agreement.
17 It should say "MOVE San Antonio Foundation."

18 Q. Okay.

19 A. Because MOVE San Antonio Foundation at that
20 time is the 501(c)(3), like, unincorporated association
21 project of the Alliance For Youth Organizing. So there
22 does seem to be a typo. It's missing the word
23 "foundation."

24 Q. Is this the first Fiscal Sponsorship Agreement
25 entered into between the Alliance For Youth Organizing

1 and -- I want to capture -- MOVE San Antonio, MOVE
2 San Antonio Foundation, MOVE Texas Action Fund, MOVE
3 Texas Civic Fund, is this the first Fiscal Sponsorship
4 Agreement between the Alliance For Youth Organizing and
5 any of those four entities I just listed?

6 A. Just to help clarify --

7 Q. Thank you.

8 A. -- at this time in 2018, MOVE Texas Action
9 Fund and MOVE Texas Civic Fund were not -- that was a
10 different name.

11 Q. Did not exist?

12 A. That was afterwards. So at this time, it
13 would have been MOVE San Antonio and MOVE San Antonio
14 Foundation. So this is not the first Fiscal Sponsorship
15 Agreement between MOVE San Antonio Foundation and the
16 Alliance For Youth Organizing.

17 Every year that we've been a fiscal sponsor of
18 the Alliance For Youth Organizing and/or previous to
19 this, the Bus Federation, we have had to sign a Fiscal
20 Sponsorship Agreement which outlines much of these same
21 details.

22 Q. Fair enough. It appears the next document
23 begins on MOVE 231 and ends on MOVE 249. Please take a
24 look and verify I am understanding that right.

25 A. I believe this document is very long. So I'm

1 going to name the starting number first --

2 **Q. Sounds good.**

3 A. -- and go to the bottom.

4 **Q. Okay.**

5 A. So this document does begin at 231 and goes to
6 249, to my knowledge.

7 **Q. And that is a single document; correct?**

8 A. That is correct.

9 **Q. Have you seen this document before?**

10 A. Yes. This is the Alliance For Youth
11 Organizing and the Alliance For Youth Actions 990, which
12 is an IRS, like, annual form. Or actually, this is an
13 auditor's report. I'm sorry, not a 90. I'm sorry. So
14 this is an auditor's report of that, of our fiscal
15 sponsorship organization.

16 **Q. Okay. Understood.**

17 **Who prepared this document?**

18 A. This document was prepared by an auditing
19 firm, which I believe the name of that audit form is
20 Han Group, LLC, and was worked on in conjunction with
21 the Alliance For Youth Organizing and Alliance For Youth
22 Actions staff.

23 **Q. Do you know why this document was prepared?**

24 A. Often nonprofit organizations do internal
25 audits to verify their finances, you know, add

1 transparency to donors.

2 Q. I would like to direct your attention to
3 MOVE 235.

4 A. Yes.

5 Q. And this appears to be a combined statement of
6 financial position as of December 31st, 2018, of the
7 Alliance For Youth Organizing and Alliance For Youth
8 Action; is that right?

9 A. That is my understanding of this.

10 Q. Okay. I just have a question about, under
11 "Net Assets," there is a category for assets with donor
12 -- "Without donor restrictions," and then a little bit
13 below that assets, "With donor restrictions."

14 Can you help me understand what is an asset
15 with a donor restriction versus an asset without a donor
16 restriction?

17 A. Speaking in broad terms, donor restrictions
18 could -- are often, like, restrictions that are set by a
19 donor on specific work. So, for instance, if a funder
20 wanted to fund MOVE Texas Civic Fund just for general
21 operating purposes, that would be without donor
22 restrictions.

23 But if they wanted to -- if they specifically
24 say in the grant agreement or the contract or anything
25 like that, that they would like to specifically fund a

123

1 fellow in Laredo. That would be with a donor
2 restriction.

3 Q. Or like I can say, "I will give you \$20,000 if
4 you will fund a fellowship for a female graduate of
5 Tom C. Clark High School," that would be a donor
6 restriction?

7 A. That would be a donor restriction.

8 Q. Wish I had \$20,000 to give away.

9 A. I was going to say I'll take you up on that.

10 Q. Yeah. All right. And so these listings on
11 financial position on 235, 236, 237, and 238, do those
12 all reflect both Alliance For Youth Organizing and
13 Alliance For Youth Action?

14 A. To my knowledge, there is a clause in this
15 audit of -- one second, I'm sorry.

16 Q. Perfect. Take your time.

17 A. (Reviewing document.) To my knowledge, that
18 is correct, because according to document 233, the
19 opening statement, it says that it's audited via
20 accompanying combined financial statements of the
21 Alliance For Youth Organizing and Alliance For Youth
22 Action, collectively referred to as the organization
23 thereafter.

24 Q. Is there a line item on any of these four
25 pages that reflects expenses for voter registration

1 **specifically?**

2 A. According to these documents, there's no line
3 item that says voter registration.

4 Q. Do you know where voter registration
5 activities would fall on the expenses identified here?

6 A. Are you referring to document 236?

7 Q. Yes, sure. Yeah.

8 A. To the best of my knowledge, that would fall
9 under the civic engagement program expense.

10 Q. What else would fall under civic engagement?

11 A. They have a specific box for voter education,
12 so they differ from us in that aspect. It's not under
13 civic education as a bucket. So I would assume that
14 most of civic engagement is -- relates to voter
15 registration or items like pledge to vote, like voter
16 contact outside of elections, like just normal
17 day-to-day civic contact.

18 Q. And then down on MOVE 241 -- actually,
19 nevermind. I got confused. Okay.

20 So as I understand it, the next document in
21 the stack begins at MOVE 250 and appears to continue to
22 252. Does that look correct to you?

23 A. That is correct. This document is MOVE -- is
24 MOVE 250 to MOVE 252.

25 Q. What is this document?

1 A. This is an Allocation of Costs and
2 Reimbursement of Expenses document between MOVE
3 San Antonio, which is the 501(c)(4) organization, and
4 the Alliance For Youth Organizing, which is our
5 501(c)(3) fiscal sponsor for then MOVE San Antonio
6 Foundation.

7 Q. Okay. Something just jumps out at me as
8 something I hadn't seen before in the previous
9 materials. In the second paragraph, it talks about the
10 social welfare purposes of MOVE, "...including but not
11 limited to building political power in underrepresented
12 youth communities through civic, leadership and
13 development, and progressive issue advocacy."

14 What is your understanding of the meaning of
15 the word "progressive" in this context?

16 MS. MARZIANI: Objection. Outside the scope
17 of the notice. This is referring to the (c)(4)
18 specifically.

19 MS. MACKIN: Q. You can answer unless your
20 attorney instructs you not to.

21 A. We see "progressive" as meaning
22 forward-facing, not a partisan term or political party
23 based term.

24 Q. Forward-facing in terms of?

25 A. Moving society forward.

1 Q. Okay. Then I think the next document is a
2 single page. MOVE 253.

3 A. That is correct.

4 Q. **Do you recognize this document?**

5 A. Yes. This is a letter that was written in
6 March 2019, signed by Sarah Audelo who is the executive
7 director of the Alliance Youth For Organizing.

8 Q. **And do you know the intended audience of this
9 letter? It just says, "To Whom It May Concern."**

10 A. This letter is used to not only notify
11 funders, grantors, foundations, but also, like, say our
12 bank, any other like financial institution that
13 essentially our name changed.

14 Q. Okay. Gotcha. So it's basically just kind of
15 making clear that what was referred to as MOVE
16 San Antonio Foundation is now going to be referred to as
17 MOVE Texas Civic Fund?

18 A. And that we remain a fiscal sponsor of
19 Alliance Youth For Organizing and fall under their
20 501(c)(3) exempt status.

21 Q. Okay. Makes sense.

22 **Then MOVE 254 appears to be a letter from the
23 IRS reflecting Alliance For Youth Organizing's 501(c)(3)
24 status. Is that a fair characterization?**

25 A. That is correct. 254 is a letter from the

1 IRS.

2 Q. Okay. Then 255 also appears to be a
3 standalone document, a W-9 form filed by Alliance For
4 Youth Organizing on October 1st, 2018.

5 Does that look correct?

6 A. That's correct. This is a pretty standard W-9
7 that just identifies the employer identification number
8 of the Alliance For Youth Organizing.

9 Q. Then the next document begins on MOVE 256 and
10 continues through MOVE 260; is that right?

11 A. That is correct.

12 Q. And it appears to be the Fiscal Sponsorship
13 Agreement entered into between the Alliance For Youth
14 Organizing and MOVE Texas Civic Fund on January 1st,
15 2019; is that right?

16 A. That is correct.

17 Q. Okay. And do you know -- I can compare the
18 documents myself, and they speak for themselves, but
19 offhand, do you know of any significant changes to the
20 agreement that were made between 2018 and 2019?

21 A. Off the top of my head without, like,
22 comparing them, like, line-by-line, there's -- every
23 year there's, like, a little, like, small changes, but
24 nothing that's dramatic. It often reports -- it often
25 just is like resetting some timelines on reporting

1 standards and that kind of stuff.

2 Q. Okay. Fair enough.

3 And then let's see the next document -- well,
4 I think we can just be clear that the next few documents
5 are tax forms between, let's see, MOVE 261 -- I'm not
6 representing that these are a single document but just
7 that they are tax filings -- beginning MOVE 261 and
8 continuing through MOVE 299.

9 A. That is correct. Not being a CPA myself, I'm
10 not sure exactly if they were all put together or if
11 they, like, were all filed together, but they are all
12 IRS documents, tax documents, on behalf of the Alliance
13 For Youth Organizing.

14 Q. Okay. Fair enough.

15 And then the document beginning on MOVE 300
16 and ending on MOVE 305, that appears to be the Fiscal
17 Sponsorship Agreement entered into between Alliance For
18 Youth Organizing and MOVE Texas Civic Fund on
19 January 1st, 2020; is that right?

20 A. That is correct. That document starts on 300
21 and finalizes on 305.

22 Q. And off the top of your head, are you aware of
23 any significant changes to the agreement between 2019
24 and 2020?

25 A. The only thing that I know is that -- is that

1 there were more nuanced or, like, there's more detail
2 put in about, like, say, for instance, item No. 4,
3 subsection D, "Expense Cutoff," that is new for this
4 year. And so there's -- and so there's some minor
5 things along those lines just like, you know, there's
6 some changes to the fiscal sponsorship fee structure as
7 well because that changed in the last -- last 12 to
8 18 months.

9 **Q. And how did that change?**

10 A. One second. I'm going to read this clause to
11 make sure that I understand. (Reviewing document.)

12 So for most of 2019, the Alliance For Youth
13 Organizing collected their typical -- their typical
14 business sponsorship fees from money that we raised from
15 MOVE Texas Civic Fund. And towards the end of 2019,
16 they decided to stop collecting those fees. And they
17 essentially said they would stop collecting those fees
18 through July 31st, 2020, and then at that time, would
19 make a decision whether to continue to, like, to start
20 collecting those fees again and -- or not to, and then
21 it sets out what those fees would look like if they did
22 start collecting them.

23 **Q. And what would the fees be if the Alliance did
24 start collecting them?**

25 A. The document says it would be "subject to a

130

1 3 percent fee starting August 1st, 2020. The fee
2 structure will increase 1 percent each year to offset
3 administrative expenses incurred by the Alliance to
4 manage the fiscal sponsorship program. A year will be
5 defined as one year from the effective date of this
6 contract."

7 **Q. And did MOVE Texas Civic Fund pay a fiscal
8 sponsorship fee to the Alliance For Youth Organizing in
9 2019?**

10 A. For most of the months we did, yes. Again, as
11 I mentioned earlier, towards the end of the summer,
12 beginning of fall, maybe middle of the fall, Alliance
13 started to stop collecting sponsorship fees on
14 MOVE Texas Civic Fund. But for most months, we did pay
15 a fiscal sponsorship fee. That's not based on a monthly
16 amount; that's based on revenues raised.

17 **Q. Revenues raised by whom?**

18 A. By MOVE Texas Civic Fund.

19 **Q. Okay. Did MOVE Texas Civic Fund pay a fiscal
20 sponsorship fee to Alliance For Youth Organizing in
21 2018?**

22 A. Yes.

23 **Q. And in 2018, what was that fee? I don't need
24 the number, but I mean, was it a percentage?**

25 A. I believe it was a percentage. I would need

1 to double-check the document to be sure, but I believe
2 it was in the 5 percent range.

3 Q. And then for those months of 2019 when
4 MOVE Texas Civic Fund paid a fiscal sponsorship fee to
5 Alliance For Youth Organizing, do you recall what that
6 fee was?

7 A. Again, I would need to double-check to verify,
8 but it goes up 1 percent every year. So I believe that
9 that was 6 percent.

10 Q. Do you know of why MOVE Texas Civic Fund has
11 elected to pay a fiscal sponsorship fee to Alliance For
12 Youth Organizing rather than just get its own 501(c)(3)
13 tax status that it can operate under?

14 A. We're in the process of filing our 501(c)(3)
15 tax status currently. And at that point, we will take,
16 like, independent control of our 501(c)(3) tax status at
17 the determination of, like, when the IRS grants that to
18 us.

19 Q. Gives you your status, yeah.

20 You said that part way through 2019, the
21 Alliance For Youth Organizing stopped charging
22 MOVE Texas Civic Fund the fiscal sponsorship fee.

23 Do you know why that decision was made?

24 A. We essentially asked them to reconsider the
25 fees because we felt they were too high.

1 Q. It does seem like -- 6 percent seems like a
2 lot of a haircut right off the top.

3 A. We know of other organizations that are
4 higher, but we just felt like -- we just felt like that
5 it needed to be renegotiated.

6 Q. I would imagine, too, the bigger the
7 organization, the lower the percentage number should
8 probably be. Because the more you're bringing in,
9 they're still getting money to cover their overhead.

10 Do you know how many other organizations are
11 fiscally sponsored by the Alliance For Youth Organizing?

12 A. Give me one second. (Reviewing document.) If
13 I can direct your attention to document 244, there is a
14 list of fiscal sponsorship organizations there that
15 under subsection 7, MOVE Texas Civic Fund -- it should
16 be "Civic Fund," not "Civic Foundation" -- Engage Miami
17 Civic Foundation, Leaders Igniting Transformation
18 Education Fund, and those are the fiscally sponsored
19 organizations at that time in 2018 under the Alliance.

20 They might -- I believe they have one or two
21 other organizations currently. Youth Engage Minnesota,
22 something along those lines, but there might be one or
23 two other fiscally sponsored, but at the time of 2018,
24 these were their fiscally sponsored organizations.

25 Q. I see a line item underneath Engage Miami

1 **Civic Foundation that just says "Voter Registration."**

2 **Do you know what that refers to?**

3 A. That could be just two other organizations
4 that are outside of the Alliance. So say, for instance,
5 if there's a student organization on a college campus
6 that needs some voter registration funding, that could
7 be a grant that they gave out. I don't have knowledge
8 of that, though.

9 Q. **Fair enough. All right. Then beginning on**
10 **page MOVE 306 and continuing through page MOVE 360,**
11 **those appear to be multiple documents with the**
12 **MOVE Texas letterhead at the top.**

13 A. One second. I just want to verify the ranges
14 real quick.

15 Q. **Sure. What I was going to ask you is these**
16 **look like they are job descriptions for both paid and**
17 **intern positions of various stripe with MOVE Texas.**

18 A. That is correct. The document formed on 360
19 and began on, I believe, 306, and these are a collection
20 of different job applications, whether those are -- I'm
21 sorry, job descriptions -- whether those are staff or
22 fellowship or internship over the time requested.

23 Q. **2018 to the present?**

24 A. That's correct.

25 Q. **Okay. You say they are a collection of job**

1 **descriptions. How did you determine which job**
2 **descriptions to include?**

3 A. We included as many that we could find that
4 weren't significantly duplicative. So if we had an
5 advocacy organizer that said Dallas, and then maybe one
6 that said Houston, we included the -- just the Dallas
7 one because it would essentially only change one word.

8 **Q. And were these all posted for between 2018 and**
9 **the present?**

10 A. To my knowledge, yes.

11 MS. MACKIN: We have been going about two
12 hours, and I don't have very much left. But if the
13 parties wouldn't mind if we take a quick five-minute
14 water break, and then we can come back at let's say
15 2:55, if that's okay with everyone.

16 THE WITNESS: Yes.

17 THE REPORTER: Off the record.

18 (Recess taken: 2:48 p.m. to 2:57 p.m.)

19 MS. MACKIN: Q. Okay. Mr. Galloway, just to
20 wrap up a couple of things, I am going to pull back up
21 Exhibit 1, the Notice of Deposition, and I'm going to
22 share it on my screen.

23 I am on page 6 of that notice, which lists
24 five categories of documents that were subpoenaed for
25 today's deposition. I just want to go through them and

1 make sure that we have documents responsive to each
2 topic and that I'm clear on what those are.

3 So starting with category 1, it requests,
4 "Documents sufficient to substantiate the factual
5 allegations in paragraphs 21 and 58 through 60 of your
6 complaint. This request does not seek all documents
7 relating to these in factual allegations, it only seeks
8 those documents necessary to substantiate these factual
9 allegations."

10 So to make sure I have those documents, would
11 it be helpful for me to pull up the complaint, or do you
12 have an understanding such that we could talk about this
13 without looking at the complaint?

14 A. I have the complaint as well up, if that's
15 helpful or if --

16 Q. **That's perfect.**

17 So did you produce documents sufficient to
18 substantiate the factual allegations in paragraphs 21
19 and 58 through 60 of your complaint?

20 A. I'm just going to review those quickly.

21 Q. **Of course.**

22 A. (Reviewing document.)

23 **Yes. We provided all known documents for**
24 **that.**

25 Q. **And then Category 2, "All communications**

1 **between you and any person to assist them in registering**
2 **to vote or updating their voter registration information**
3 **after a driver license renewal or change of address**
4 **transaction on the DPS website." Did you produce**
5 **documents responsive to this category?**

6 A. As I outlined earlier, we searched our
7 databases for those documents. You know, again, all
8 full-time staff members, selected search terms, selected
9 search areas, those communications regarding updating
10 voter registration after a driver's license renewal,
11 change of address, DPS website, are often oral, like,
12 occurrences and are not -- we have no documents on that.

13 Q. **Category 3, "Documents sufficient to show all**
14 information described and/or requested in 30(b)(6)
15 **deposition topics No. 2, 3, 4, and 5, as described in**
16 **Attachment A to this notice. This request does not seek**
17 **all such documents; it seeks only those documents**
18 **necessary to show this information."**

19 So by reference, we can pop back up to
20 **Exhibit 2. Did you produce documents sufficient to show**
21 **the information requested in deposition topic 2?**

22 A. Yes, to the best of our knowledge.

23 Q. Okay. And did you produce documents
24 sufficient to show the information requested in
25 deposition topic 3, funding amounts, operational

1 expenses, and operational budget between January 1st,
2 2018, and the present?

3 A. Yes, all the documents that we have existing.

4 Q. Okay. Did you produce documents sufficient to
5 show the information in topic 4, "All activities on
6 which you have spent funds or to which you have
7 dedicated resources in Texas between January 1st, 2018,
8 and the present"?

9 A. Yes.

10 Q. Did you produce documents sufficient to show
11 the information requested in topic 5, "All activities on
12 which you plan to spend funds or to which you plan to
13 dedicate resources in Texas between the present and
14 January 1st, 2024"?

15 A. Yes. I just want to note that we don't have
16 documents or plans past 2020 at this point.

17 Q. Okay. Fair enough. Thank you for that
18 clarification.

19 Moving on to document category 4, "Documents
20 sufficient to show your organizational structure and
21 internal employee hierarchy including organizational
22 chart and job descriptions of all employees," did you
23 produce documents responsive to this category?

24 A. Yes.

25 Q. Thank you. And then category 5, "To the

1 extent not already provided in response to items 1
2 through 4 above, all documents reviewed in preparation
3 for your deposition," did you produce documents
4 responsive to this category?

5 A. Yes.

6 Q. Okay. Do you know Erica Elliott?

7 A. I do.

8 Q. Who is Ms. Elliott?

9 A. Ms. Elliott is currently our regional
10 organizing manager, and she oversees three cities for
11 the organization.

12 Q. Are you Ms. Elliott's supervisor?

13 A. Currently, I am.

14 Q. Are you familiar with her job duties and her
15 performance?

16 A. Can you -- I'm sorry, you broke up. Am I
17 familiar with her --

18 Q. Her job duties and her performance?

19 A. Yes.

20 Q. To your knowledge, has Ms. Elliott ever turned
21 away a voter who has or an individual seeking to
22 register to vote who has sought her assistance?

23 MS. MARZIANI: Objection. Vague.

24 MS. MACKIN: Q. You can answer if you
25 understand my question.

1 A. To my knowledge, no.

2 Q. Has Ms. Elliott ever expressed to you that she
3 has had trouble handling the volume of people who come
4 seek her assistance with voter registration at either a
5 tabling or canvassing or other voter registration
6 activity?

7 A. Can you -- can you restate the question?

8 Q. Sure. So let me ask you a different question.

9 Can you describe what Ms. Elliott's job duties
10 are with respect to voter registration efforts on behalf
11 of MOVE Texas Civic Fund?

12 A. As a regional organizing manager, Ms. Elliott
13 -- Ms. Elliott helps implement our voter registration
14 activities in Dallas, Austin and San Marcos. She trains
15 field organizers, and she trains fellows and interns and
16 volunteers. She ensures voter registration compliance.
17 She ensures like our accountability goals, metrics, that
18 kind of thing. And then as-needed, she often interacts
19 with voters in the field, in classrooms, tabling,
20 canvassing.

21 Q. Has Ms. Elliott ever given you any indication
22 that MOVE Texas Civic Fund is unable to accommodate the
23 volume of individuals they encounter in their voter
24 registration efforts?

25 A. Ms. Elliott might report to me that there is a

1 very busy, like, voter registration shift. Like, let's
2 say, for instance, on Texas State in San Marcos. But at
3 no time does anybody in our organization intentionally
4 turn away somebody that's trying to register to vote or
5 trying to, you know, get -- ask questions.

6 Q. Okay. Then I just have one more document to
7 show you. I am going to publish on the screen what will
8 be Exhibit 3 to this deposition.

9 (Exhibit No. 3 was marked for identification.)

10 MS. MACKIN: Q. Do you recognize this
11 document, Mr. Galloway?

12 A. I do.

13 Q. And what is it?

14 A. It is my declaration in coordination with this
15 case.

16 Q. And that is your signature down at the bottom
17 of the last page?

18 A. That is correct.

19 Q. It was executed January 16th, 2020; is that
20 right?

21 A. Yes.

22 Q. Okay. And who wrote this declaration?

23 A. I believe it was written in conjunction with
24 my legal counsel.

25 Q. And you reviewed it before you signed it;

1 **correct?**

2 A. That's correct.

3 Q. I would like to direct your attention to
4 **paragraph 3, which states, "MOVE Texas is a grassroots,**
5 **nonpartisan organization that builds power in**
6 **underrepresented youth communities through civic**
7 **education, leadership development, and issue advocacy."**

8 **Did I read that right?**

9 A. That's correct.

10 Q. **And are there any civic education, leadership**
11 **development, or issue advocacy activities that MOVE**
12 **Texas Civic Fund conducts that we haven't talked about**
13 **today?**

14 A. To my knowledge, we've talked about the
15 majority of all of our activities. We might not have,
16 like, pointed it out to the documents that were, like,
17 there. But yes, civic education is, again, voter
18 registration, voter education, very, very specific voter
19 mobilization. Leadership development is fellows and
20 interns and volunteers.

21 Q. **So there may be like a specific little program**
22 **that we didn't directly touch on, but we talked**
23 **generally about the broad categories of activity that**
24 **MOVE Texas Civic Fund engages in; right?**

25 A. Yes, that's correct.

1 Q. Okay. And you testified that -- I'm going to
2 pull this down. We don't need it anymore. You
3 testified that voter registration is a key piece of
4 MOVE Texas Civic Fund's activities; right?

5 A. That is correct.

6 Q. **Has that been the case ever since MOVE Texas**
7 **Civic Fund was established?**

8 A. That has been the case since MOVE San Antonio
9 Foundation was started, and then when we changed the
10 name to MOVE Texas Civic Fund, that work continued.

11 Q. **And do you anticipate that that will still be**
12 **a focus of MOVE Texas Civic Fund going forward into the**
13 **future?**

14 A. We anticipate that we will continue
15 registering voters until a larger more systemic voter
16 registration system is implemented by the State of
17 Texas.

18 Q. **So what does that mean to you?**

19 A. Voter registration is a core aspect of our
20 mission, and if the State of Texas implemented online
21 voter registration and/or even automatic voter
22 registration where young Texans in particular, but any
23 Texan, could register themselves to vote easily without
24 necessarily printing off forms from the website or
25 anything like that, then at that point, we would

1 determine whether we wanted to shift our mission at that
2 point away from voter registration.

3 But until that day comes, MOVE Texas Civic
4 Fund will be predominantly a voter registration
5 organization.

6 Q. So correct me if I'm wrong because I'm not
7 trying to mischaracterize what you've said. Essentially
8 you anticipate -- what I'm hearing you to say is that
9 you anticipate that MOVE Texas Civic Fund will continue
10 to be predominantly a voter registration organization
11 unless and until Texas provides for online voter
12 registration or some other process that is significantly
13 easier than what's available now?

14 A. That is correct.

15 Q. Okay. Why did MOVE Texas Civic Fund decide to
16 join this lawsuit?

17 A. We decided to join this lawsuit because we
18 feel that young people who engage in the -- who utilize
19 the Department of Public Safety website to update their
20 driver's license address are not -- believe they are
21 registered to vote after they do that process and are
22 not actually registered to vote often when we talk to
23 them.

24 Q. What are your expectations from this lawsuit?
25 I don't mean you personally, but your understanding of

1 **MOVE Texas Civic Fund's expectations?**

2 A. We are in alignment with the other plaintiffs
3 that we believe a remedy to this problem is, you know,
4 robustly fixing -- robustly altering the Department of
5 Public Safety website to be able to -- to be able to
6 meet these same standard of in-person driver's license,
7 you know, voter registration that happens underneath the
8 Voter Motor Act at the actual Department of Public
9 Safety.

10 Q. **Okay. Have I been -- have I treated you
11 courteously during today's deposition?**

12 A. Yes, you have. Thank you.

13 MS. MACKIN: Pass the witness. Thank you for
14 your time.

15 MS. MARZIANI: Thank you.

16 EXAMINATION

17 BY MS. MARZIANI:

18 Q. **I just have one quick question, which is,
19 Drew, earlier today, you spoke about the civic education
20 voter registration work being split into three
21 categories: Class Raps, Tabling and Canvassing.**

22 Earlier today, you also talked about mailing
23 voter registration forms.

24 So my question is: Do you characterize
25 mailing voter registration forms into one of those three

1 **sub sub buckets, to use the term we used before, or is**
2 **it a separate fourth category?**

3 A. Yeah. In the context of those PowerPoint
4 slides, those were the three sort of like traditional,
5 forward-facing, like more public versions of voter
6 registration that we do. Again, that would be Class
7 Raps, or class presentations, Canvassing, and Tabling.

8 Those are the activities that target audience,
9 say, for instance, fellows, interns, volunteers, would
10 be actually engaged in when it came to voter
11 registration. And when we think of voter registration
12 and the community thinks of voter registration, those
13 are activities that they see us involved in.

14 We've run one mail -- voter registration mail
15 program in late 2018 -- I'm sorry, late 2019, early
16 2020. And the nature of that program is that it -- you
17 know, we, again, as I mentioned earlier, define a group
18 of unregistered voters under the age of 30, and then we
19 just mail them a voter registration card.

20 I believe the reason that that's not on that
21 PowerPoint is because that is a very, like,
22 behind-the-scenes strategy when it comes to voter
23 registration. Fellows, interns, volunteers are not
24 involved in that process. That is a -- that is like a
25 field director, executive director program.

1 MS. MARZIANI: Thank you. I'll pass the
2 witness to the plaintiff-intervenors, if they are on the
3 call and would like to ask any questions.

4 MS. BRAILEY: Thank you. We have no
5 questions.

6 MS. MARZIANI: Thank you.

7 MS. MACKIN: All right. I think we're ready
8 to go off the record.

9 Ms. Schroeder, are there any spellings that
10 you need from any of us?

11 THE REPORTER: At this moment, no, because I
12 believe a lot of them may have been on that org chart.
13 Okay. But I did need to know if, Mimi, you need a copy
14 of the transcript?

15 MS. MARZIANI: Yes. And I would like to
16 reserve my right to review and correct.

17 THE REPORTER: Okay.

18 (Deposition adjourned at 4:11 p.m.)

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147

1 ERRATA AND SIGNATURE

2 WITNESS NAME: DATE OF DEPOSITION:

3 HILLIARD DREW GALLOWAY THURSDAY, APRIL 23, 2020

4 PAGE/LINE CHANGE REASON

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148

1 I, HILLIARD DREW GALLOWAY, have read the
2 foregoing deposition and hereby affix my signature that
3 same is true and correct, except as noted herein.

4

5

6 HILLIARD DREW GALLOWAY

7

8 THE STATE OF _____)

9 Before me, _____, on
10 this day personally appeared HILLIARD DREW GALLOWAY,
11 known to me (or proved to me under oath or through
12 _____) (description of identity card or other
13 document) to be the person whose name is subscribed to
14 the foregoing instrument and acknowledged to me that
15 they executed same for the purposes and consideration
16 therein expressed.

17 Given under my hand and seal of office on
18 this _____ day of _____, _____.

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NOTARY PUBLIC IN AND FOR

THE STATE OF _____

My Commission Expires: _____

149

1 STATE OF TEXAS)

2 REPORTER'S CERTIFICATION

3 I, KIMBERLEE SCHROEDER, CSR, RPR, CCRR,
4 Certified Shorthand Reporter for the State of Texas,
5 License No. 10925 and the State of California, License
6 No. 11414, hereby certify that the witness was duly
7 sworn and that this transcript is a true record of the
8 testimony given by the witness.

9 I further certify that I am neither counsel
10 for, related to, nor employed by any of the parties or
11 attorneys in the action in which this proceeding was
12 taken. Further, I am not a relative or employee of any
13 attorney of record in this cause, nor am I financially
14 or otherwise interested in the outcome of the action.

15 Subscribed and sworn to by me this day,
16 11th day of May, 2020.

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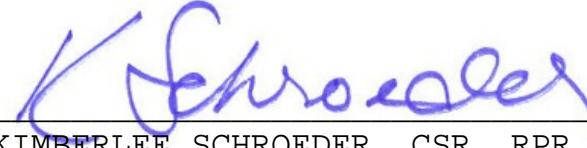
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KIMBERLEE SCHROEDER, CSR, RPR, CCRR
TX CSR No. 10925 - CA CSR No. 11414